

SELENDY GAY ELSBERG PLLC

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Co-Counsel for the Official Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10964 (MG)

(Jointly Administered)

**NOTICE OF FOURTH MONTHLY STATEMENT OF SELENDY GAY ELSBERG
PLLC FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES AS
CO-COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD FROM MAY 1, 2023 THROUGH MAY 31, 2023**

PLEASE TAKE NOTICE that on the date hereof, Selendy Gay Elsberg PLLC (“**Selendy Gay Elsberg**”) filed its *Fourth Monthly Statement of Selendy Gay Elsberg PLLC for Interim Compensation and Reimbursement of Expenses as Co-Counsel for the Official Committee of Unsecured Creditors for the Period from May 1, 2023 through May 31, 2023* (the “**Monthly**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 USA LLC (9450); GK8 Ltd. (1209); and GK8 UK Limited (0893). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

Statement”) with the United States Bankruptcy Court for the Southern District of New York and served it on the Monthly Fee Statement Recipients. *See* Docket No. 1745 ¶ 3.a.

PLEASE TAKE FURTHER NOTICE that any responses or objections (an “**Objection**”) to the Monthly Statement, if any, shall: (a) conform to title 11 of the United States Code (the “**Bankruptcy Code**”), the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the Local Bankruptcy Rules for the Southern District of New York (the “**Local Rules**”), all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York, and the *First Amended Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* [Docket No. 1745] (the “**Interim Compensation Procedures**”);² (b) be served via email so as to be actually received by **12:00 p.m., prevailing Eastern Time on the date that is 14 days following the service of this Monthly Statement**, by (i) Selendy Gay Elsberg and (ii) the Monthly Fee Statement Recipients; and (c) set forth the nature of the Objection and the amount of fees or expenses at issue. *See* Docket No. 1745 ¶ 3.d.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Interim Compensation Procedures, if no Objection to the Monthly Statement is served, the Debtors shall promptly pay 80% of the fees and 100% of the expenses identified in the Monthly Statement to Selendy Gay Elsberg.

PLEASE TAKE FURTHER NOTICE that if an Objection to the Monthly Statement is timely served, the Debtors shall withhold payment of only that portion of the Monthly Statement

² Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Interim Compensation Procedures.

to which the Objection is directed and promptly pay 80% of the fees and 100% of the expenses of the unobjected-to remainder.

PLEASE TAKE FURTHER NOTICE that copies of the Monthly Statement and other pleadings filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/celsius>. You may also obtain copies of the Monthly Statement and other pleadings filed in these chapter 11 cases by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: July 13, 2023

Respectfully submitted,

/s/ Jennifer M. Selendy

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10964 (MG)

(Jointly Administered)

**FOURTH MONTHLY STATEMENT OF SELENDY GAY ELSBERG PLLC FOR
INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES AS CO-
COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
THE PERIOD FROM MAY 1, 2023 THROUGH MAY 31, 2023**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 USA LLC (9450); GK8 Ltd. (1209); and GK8 UK Limited (0893). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

Name of Applicant:	Selendy Gay Elsberg
Authorized to Provide Professional Services to:	The Official Committee of Unsecured Creditors (the “ Committee ”) of the above-captioned debtors and debtors-in-possession (collectively, the “ Debtors ”)
Date of Retention:	March 16, 2023 [Docket No. 2251] <i>Effective as of January 8, 2023</i>
Period for Which Interim Compensation and Reimbursement of Expenses is Sought:	May 1, 2023 – May 31, 2023 (the “ Compensation Period ”)
Total Amount of Interim Compensation Sought as Actual, Reasonable, and Necessary (100%):	\$814,711.00
Amount of Interim Compensation to be Paid Under Interim Compensation Procedures (80%):	\$651,768.80
Amount of Interim Compensation to be Held Back Under Interim Compensation Procedures (20%):	\$162,942.20
Amount of Reimbursement of Expenses Sought as Actual and Necessary:	\$2,202.80
Total Interim Compensation and Reimbursement of Expenses Sought:	\$816,913.80
Total Interim Compensation and Reimbursement of Expenses to be Paid Under Interim Compensation Procedures:	\$653,971.60

This is a monthly fee statement.

Pursuant to sections 330 and 331 of the Bankruptcy Code,² Bankruptcy Rule 2016, Local Rule 2016-1, the *Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York Bankruptcy Cases*, dated January 29, 2013 (Morris, C.J.) (Administrative Order M-447), the Interim Compensation Procedures, and the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* effective as of November 1, 2013 (the “U.S.

² Capitalized terms not defined herein shall have the meaning ascribed to such terms in the Notice of Monthly Statement attached hereto.

Trustee Guidelines”), Selendy Gay Elsberg PLLC (“**Selendy Gay Elsberg**” or the “**Firm**”), as co-counsel to the Committee, hereby submits this Monthly Statement for the Compensation Period, and hereby requests that the Debtors promptly pay an aggregate amount of \$653,971.60, consisting of 80% of the \$814,711.00 in fees earned and 100% of the \$2,202.80 in expenses incurred.

Professional Services Rendered and Expense Disbursements Incurred

1. Prior to filing this Monthly Statement, Selendy Gay Elsberg reviewed its fees (which totalled 1046.90 hours and \$845,059.50) and expenses (which totalled \$3,147.66). Following that review, Selendy Gay Elsberg voluntarily elected to reduce its fees by 40.20 hours and \$30,348.50 (~3.6%) and its expenses by \$944.86 (~30%). Selendy Gay Elsberg will not seek payment for the fees and expenses that it has agreed to voluntarily write off. Therefore, by this Monthly Statement, Selendy Gay Elsberg requests payment of an aggregate amount of \$653,971.60, consisting of 80% of the \$814,711.00 in fees earned and 100% of the \$2,202.80 in expenses incurred.

2. **Exhibit A** sets forth a timekeeper summary that includes: (a) the name, title, and year of admission to practice (if applicable) of each individual who provided services during the Compensation Period; (b) the aggregate hours spent by each individual for which compensation is sought by Selendy Gay Elsberg; (c) the hourly billing rate for each such individual; and (d) the amount of fees for each such individual for which compensation is sought by Selendy Gay Elsberg. The blended rate for compensation requested in this Monthly Statement is approximately \$809.28 per hour.³

3. **Exhibit B** sets forth a project summary that includes the aggregate hours and fees

³ The blended rate is calculated by taking the total of fees sought in this Monthly Statement and dividing by the total of hours sought in this Monthly Statement, rounded to the nearest dollar.

per project category spent by Selendy Gay Elsberg timekeepers in rendering services to the Committee during the Compensation Period.

4. **Exhibit C** sets forth the time records for Selendy Gay Elsberg timekeepers for which compensation is sought by Selendy Gay Elsberg, including an itemization of tasks performed in rendering services to the Committee during the Compensation Period.

5. **Exhibit D** sets forth both a summary and detailed entries of the expenses for which Selendy Gay Elsberg seeks reimbursement during the Compensation Period.

6. The following is a brief narrative summary of the services performed by Selendy Gay Elsberg on behalf of the Committee during the Compensation Period, organized by project category:

No.	Category Name	Hours	Fees
10	Retention Application	34.1	\$25,907.00
	Selendy Gay Elsberg prepared, drafted, and filed a Third Declaration supporting the Committee's application to retain Selendy Gay Elsberg as co-counsel [filed in May 2023 at Docket No. 2636]. This includes time spent conducting an updated disclosure review of the Parties in Interest listed in Selendy Gay Elsberg's Retention Application and time spent conducting a disclosure review of the Supplemental Parties in Interest listed in Selendy Gay Elsberg's Third Declaration.		
20	Fee Statements and Applications	12.5	\$10,408.00
	Selendy Gay Elsberg prepared its Second Monthly Fee Statement in accordance with the Interim Compensation Procedures, the U.S. Trustee Guidelines, and guidance provided by the Fee Examiner. This includes time spent working with the Firm's billing department to calculate the underlying numbers and drafting the statement. Selendy Gay Elsberg also conferred with counsel to the Fee Examiner regarding Selendy Gay Elsberg's Interim Fee Application for the Period January 8, 2023 through February 28, 2023 [filed in April 2023 at Docket No. 2452].		
30	Case Administration	73.8	\$65,221.00
	Due to the size and complexity of these chapter 11 cases, Selendy Gay Elsberg professionals were involved in various administrative tasks, including (i) reviewing and summarizing docket filings; (ii) attending to internal case, file, and calendar management; (iii) coordinating with other Selendy Gay Elsberg professionals to discuss and review workstreams in process and staffing; and (v) tasks to support attorney discovery and fact		

No.	Category Name	Hours	Fees
	development needs including the preparation and creation of binders for attorney review and the preparation of subpoenas.		
40	Case Strategy	79.8	\$82,178.50
	Selendy Gay Elsberg researched relevant law and facts regarding the Committee's legal interests and conferred internally and with co-counsel regarding the Committee's strategy. This included meeting on and analyzing core case issues related to certain plan matters.		
50	WestCap Matters Filings	0.0	\$00.00
	Selendy Gay Elsberg did not bill any time to this project category during the Compensation Period.		
60	Discovery and Fact Development	680.7	\$529,119.50
	Selendy Gay Elsberg prepared, drafted, and served discovery requests upon the Series B Holders ⁴ in connection with the matters contemplated within the scope of the April 24 Scheduling Order [Docket No. 2522], including requests for productions, requests for admissions, deposition notices, and interrogatories. Selendy Gay Elsberg reviewed, analyzed, and assisted in the Committee's responses to discovery requests served upon the Committee by the Series B Holders. Selendy Gay Elsberg prepared for and met and conferred with counsel to the Series B Holders concerning this discovery. Selendy Gay Elsberg reviewed and analyzed documents produced by the Series B Holders and the Debtors to the Committee in connection with the Committee's legal interests and strategy, including creating and reviewing work product analyzing the same.		
70	Hearings and Court Matters	0.0	\$00.00
	Selendy Gay Elsberg did not bill any time to this project category during the Compensation Period.		
80	Other	0.0	\$00.00
	Selendy Gay Elsberg did not bill any time to this project category during the Compensation Period.		
90	Plan/Confirmation Matters	45.2	\$36,208.50
	Selendy Gay Elsberg strategized regarding retaining an expert to in connection with pending litigation on certain plan matters contemplated within the scope of the April 24 Scheduling Order [Docket No. 2522]. Selendy Gay Elsberg also researched and strategized on legal issues related to pending litigation on certain plan matters.		
95	FTX Matters Filings	80.6	\$65,668.50
	Selendy Gay Elsberg prepared, drafted, and served subpoenas on the FTX Debtors and filed a notice of subpoenas in these chapter 11 cases [Docket No. 2642]. Selendy Gay		

⁴The Series B Holders are Community First Partners, LLC; Celsius SPV Investors, LP; Celsius New SPV Investors, LP; and CDP Investissements Inc.

No.	Category Name	Hours	Fees
	Elsberg also corresponded with, prepared to meet-and-confer, and conferred with counsel for the FTX Debtors regarding these Rule 2004 subpoenas. Selendy Gay Elsberg also analyzed and conferred regarding potential claims in the FTX Debtors bankruptcy.		

Reservation of Rights

7. Although Selendy Gay Elsberg has made every effort to include all fees earned and expenses incurred during the Compensation Period, some fees and expenses might not be included in this Monthly Statement due to delays caused by accounting and processing during the Compensation Period. Selendy Gay Elsberg reserves the right to seek payment of such fees and expenses not included herein.

Notice

8. Selendy Gay Elsberg will provide notice of this Monthly Statement to the Monthly Fee Statement Recipients in accordance with ¶ 3.a of the Interim Compensation Procedures.

Dated: July 13, 2023

Respectfully submitted,

/s/ Jennifer M. Selendy

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*Co-Counsel for the Official Committee of
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Exhibit A

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Year Admitted</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Abel, Robert	Contract Attorney	2007	25.4	\$400.00	\$10,160.00
Aganga-Williams, Temidayo	Partner	2012	43.3	\$1,435.00	\$62,135.50
Agard, Toni	Contract Attorney	1999	35.2	\$400.00	\$14,080.00
Burke, Tyler	Director of Research & Analysis	N/A	15.5	\$685.00	\$10,617.50
Cohen, Eric	Litigation Support	N/A	0.1	\$350.00	\$35.00
Chen, Kayla	Law Clerk	<i>pending</i>	128.4	\$685.00	\$87,954.00
Clifton, Anna	Research Analyst	N/A	7.9	\$630.00	\$4,977.00
Gay, Faith	Partner	1987	7.8	\$2,060.00	\$16,068.00
Journey, Christopher	Paralegal	N/A	17.5	\$570.00	\$9,975.00
La Fontaine, Yury	Litigation Support	N/A	1.7	\$350.00	\$595.00
Mitchell, Zachary	Law Clerk	<i>pending</i>	101.4	\$685.00	\$69,459.00
Metro, Steven	Managing Clerk	N/A	4.8	\$570.00	\$2,736.00
Mon-Cureño, Alvaro	Associate	2019	83.9	\$1,190.00	\$99,841.00
O'Brien, Claire	Associate	2018	114.6	\$1,250.00	\$143,250.00
Pugh, Abbie	Staff Attorney	2010	77.7	\$685.00	\$53,224.50
Rivera, Eddie	Senior Paralegal	N/A	2.1	\$570.00	\$1,197.00
Sawczuk, Lara	Contract Attorney	2012	10.7	\$400.00	\$4,280.00
Selendy, Jennifer	Partner	1996	18.8	\$2,060.00	\$38,728.00
Seri, Tesla	Staff Attorney	2017	232.3	\$570.00	\$132,411.00
Siegel, Scott	Paralegal Manager	N/A	33.9	\$570.00	\$19,323.00

<u>Name</u>	<u>Title</u>	<u>Year Admitted</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Slepoi, Rachel	Associate	2023	42.3	\$775.00	\$32,782.50
Zhang, Andrew	Graduate Analyst	N/A	1.4	\$630.00	\$882.00
Grand Total			1,006.7		\$814,711.00

Exhibit B

Project Summary

<u>Code</u>	<u>Project</u>	<u>Hours</u>	<u>Amount</u>
10	Retention application	34.1	\$25,907.00
20	Fee statements and applications	12.5	\$10,408.00
30	Case administration	73.8	\$65,221.00
40	Case strategy	79.8	\$82,178.50
60	Discovery and fact development	680.7	\$529,119.50
90	Plan/Confirmation Matters	45.2	\$36,208.50
95	FTX Matters Filings	80.6	\$65,668.50
	Grand Total	1006.7	\$814,711.00

Exhibit C

Time Records

Official Committee of Unsecured Creditors

RE: In re Celsius Network LLC, et al.

For Professional Services Rendered Through May 31, 2023

FEES

Date	Person	Description of Services	Hours	Rate	Amount
<u>10 - Retention application</u>					
5/5/2023	Kayla Chen	Call with A. Pugh re third declaration connections review process (.5); call with T. Burke and A. Pugh re same (.5); review and analyze updated results from disclosure review and connections process (.8).	1.8	\$685.00	\$1,233.00
5/5/2023	Abbie Pugh	Calls with K. Chen and T. Burke re supplemental declaration.	0.6	\$685.00	\$411.00
5/5/2023	Tyler Burke	Summarize new connections found via expanded search, compile tables.	4.8	\$685.00	\$3,288.00
5/6/2023	Kayla Chen	Correspond with T. Burke updated results from disclosure review and connections process (.4); review and analyze updated disclosure review and connections results (.5).	0.9	\$685.00	\$616.50
5/7/2023	Kayla Chen	Correspond with T. Burke updated results from disclosure review and connections process (.1); review and analyze updated results from same (.3); correspond with conflicts department re same (.2).	0.6	\$685.00	\$411.00
5/7/2023	Tyler Burke	Review, advise on IP client data cross reference findings.	2.8	\$685.00	\$1,918.00

FEES

Date	Person	Description of Services	Hours	Rate	Amount
<u>10 - Retention application</u>					
5/8/2023	Kayla Chen	Correspond with T. Burke re updated results from disclosure review and connections process (.3); correspond with conflicts department re same (.4) review and analyze updated results (.5); correspond with finance on 1% revenue disclosure (.3); draft and revise third Selendy declaration in support of SGE retention application (1.0).	2.5	\$685.00	\$1,712.50
5/9/2023	Claire O'Brien	Call with A. Pugh and K. Chen re supplemental declaration for retention application.	1.0	\$1,250.00	\$1,250.00
5/9/2023	Kayla Chen	Call with A. Pugh re updated disclosure review results (.4); call with C. O'Brien and A. Pugh re third declaration updates (1.0); review and analyze updated disclosure review results (.2); correspond with T. Burke re same (.1); draft and revise third declaration incorporating the same (.3).	2.0	\$685.00	\$1,370.00
5/9/2023	Abbie Pugh	Call with K. Chen re supplemental declaration (.4); call with K. Chen and C. O'Brien re same (.9).	1.3	\$685.00	\$890.50
5/9/2023	Abbie Pugh	Call with K. Chen re supplemental declaration (.4); call with C. O'Brien re same (.9).	1.3	\$685.00	\$890.50
5/9/2023	Tyler Burke	Analyze results of updated Client/IP data analysis for retention application update.	2.4	\$685.00	\$1,644.00
5/10/2023	Claire O'Brien	Confer with K. Chen re retention application supplemental declaration.	0.2	\$1,250.00	\$250.00
5/10/2023	Kayla Chen	Correspond with conflicts department re disclosure review (.2); correspond with T. Burke re same (.1); correspond with finance department re same (.2), draft and revise third declaration (.9); correspond with C. O'Brien re same (.2).	1.6	\$685.00	\$1,096.00
5/10/2023	Tyler Burke	Review and analyze updated disclosure review results in response to K.Chen inquiries (1.8); communicate with K. Chen re same (0.3).	2.1	\$685.00	\$1,438.50
5/11/2023	Jennifer M Selendy	Review and comment on supplemental retention declaration.	0.3	\$2,060.00	\$618.00
5/11/2023	Claire O'Brien	Review and revise supplemental Selendy declaration in support of retention application.	2.1	\$1,250.00	\$2,625.00
5/11/2023	Kayla Chen	Review, analyze and incorporate C. O'Brien comments and edits into Third Declaration in support of retention application (.7); correspond with C. O'Brien re same (.2).	0.9	\$685.00	\$616.50

FEES

Date	Person	Description of Services	Hours	Rate	Amount
10 - Retention application					
5/12/2023	Claire O'Brien	Email with J. Selendy re third supplemental declaration in support of retention application.	0.2	\$1,250.00	\$250.00
5/12/2023	Claire O'Brien	Call with K. Chen re J. Selendy edits to supplemental declaration in support of retention application.	0.3	\$1,250.00	\$375.00
5/12/2023	Kayla Chen	Call with C. O'Brien re J. Selendy edits to supplemental declaration in support of retention application (.3); revise third declaration incorporating J. Selendy edits to same (.4); correspond with J. Selendy re same (.2); correspond with S. Ludovici re third declaration in support of retention application (.1); redact and proof third declaration in support of retention application for filing (.8); correspond with MCO re filing third declaration in support of retention application (.3); draft cover letter for unredacted Third Declaration in support of retention application for service on court (.2).	2.3	\$685.00	\$1,575.50
5/12/2023	Steven M Metro	Review and file Third Declaration on retention application with court.	1.1	\$570.00	\$627.00
5/14/2023	Kayla Chen	Correspond with S. Siegel re service of unredacted third declaration in support of retention application (.1); prepare unredacted third declaration in support of retention application for service (.2); correspond with Kroll re third declaration in support of retention application service (.2).	0.5	\$685.00	\$342.50
5/14/2023	Scott Siegel	Prepare third declaration in support of SGE retention application for service on court.	0.1	\$570.00	\$57.00
5/15/2023	Temidayo Aganga-Willis	Review of supplemental declaration in support of retention application.	0.2	\$1,435.00	\$287.00
5/15/2023	Scott Siegel	Serve unredacted version of third declaration re UCC retention to the court clerk.	0.2	\$570.00	\$114.00
Subtotal for: 10 - Retention application			34.1		\$25,907.00

20 - Fee statements and applications

5/4/2023	Rachel Slepoy	Correspond with C. O'Brien and J. Rivera re April fee statement.	0.1	\$775.00	\$77.50
5/15/2023	Claire O'Brien	Meet with Z. Mitchell re April fee statement.	0.5	\$1,250.00	\$625.00
5/15/2023	Claire O'Brien	Second meeting with Z. Mitchell re April fee statement.	0.5	\$1,250.00	\$625.00

FEES

Date	Person	Description of Services	Hours	Rate	Amount
<u>20 - Fee statements and applications</u>					
5/15/2023	Kayla Chen	Call with C. O'Brien re fee guidelines and review and analyze docket filings for same.	0.2	\$685.00	\$137.00
5/15/2023	Rachel Slepoy	Communication with billing department re invoicing consistent with U.S. Trustee guidelines.	0.4	\$775.00	\$310.00
5/15/2023	Zachary Mitchell	Meet with C. O'Brien re US Trustee fee guidelines and privilege considerations.	0.2	\$685.00	\$137.00
5/18/2023	Claire O'Brien	Emails with J. St. Louis re April fee statement.	0.1	\$1,250.00	\$125.00
5/19/2023	Rachel Slepoy	Consult with Z. Mitchell re April fee statement.	0.2	\$775.00	\$155.00
5/22/2023	Claire O'Brien	Confer with Z. Mitchell re April fee statement.	0.3	\$1,250.00	\$375.00
5/22/2023	Rachel Slepoy	Assist Z. Mitchell re April fee statement draft.	0.2	\$775.00	\$155.00
5/23/2023	Kayla Chen	Call with Z. Mitchell re April Fee statement process.	0.2	\$685.00	\$137.00
5/23/2023	Rachel Slepoy	Manage invoice payment for March.	0.1	\$775.00	\$77.50
5/23/2023	Zachary Mitchell	Call with K. Chen re fee application procedure (.2); draft third fee statement (.9).	1.1	\$685.00	\$753.50
5/25/2023	Claire O'Brien	Review and analyze letter from Fee Examiner.	0.6	\$1,250.00	\$750.00
5/25/2023	Kayla Chen	Review and analyze fee examiner letter.	0.2	\$685.00	\$137.00
5/25/2023	Zachary Mitchell	Correspond with billing department re final invoice for April time.	0.1	\$685.00	\$68.50
5/26/2023	Zachary Mitchell	Draft fee statement for April 2023 using final fees and expenses from invoice.	3.3	\$685.00	\$2,260.50
5/29/2023	Claire O'Brien	Review draft of April 2023 fee statement.	0.9	\$1,250.00	\$1,125.00
5/30/2023	Rachel Slepoy	Call C. O'Brien re letter response to Fee Examiner memo.	0.4	\$775.00	\$310.00
5/30/2023	Zachary Mitchell	Correspond with Billing re expense entries in April fee statement (.2); update fee statement to include expense timekeepers (.6).	0.8	\$685.00	\$548.00
5/31/2023	Rachel Slepoy	Draft letter to Fee Examiner re first interim fee statement.	0.9	\$775.00	\$697.50
5/31/2023	Zachary Mitchell	Revise fee statement with expense information (.1); correspond with J. Selendy re edits to fee statement (.2); correspond with S. Ludovici re April fee statement (.3); finalize fee statement for filing (.6).	1.2	\$685.00	\$822.00
Subtotal for: 20 - Fee statements and applications			12.5		\$10,408.00

FEES

Date	Person	Description of Services	Hours	Rate	Amount
<u>30 - Case administration</u>					
5/1/2023	Temidayo Aganga-Williams	Weekly case team meeting with R. Slepoy, C. O'Brien, A. Pugh, J. Selendy, Z. Mitchell and T. Goodrich regarding ongoing workstreams and upcoming discovery.	1.8	\$1,435.00	\$2,583.00
5/1/2023	Claire O'Brien	Attend weekly SGE team meeting re ongoing workstreams with T. Aganga-Williams, J. Selendy, R. Slepoy, Z. Mitchell, T. Seri, A. Pugh.	1.8	\$1,250.00	\$2,250.00
5/1/2023	Claire O'Brien	Revise case tracker with updated workstream status.	0.3	\$1,250.00	\$375.00
5/1/2023	Rachel Slepoy	Attend weekly meeting with J. Selendy, T. Aganga-Williams, C. O'Brien, Z. Mitchell, A. Pugh, and T. Seri.	1.0	\$775.00	\$775.00
5/1/2023	Zachary Mitchell	Attend weekly team meeting with case team, including T. Aganga-Williams and J. Selendy, re upcoming discovery requests and workstream scheduling.	1.0	\$685.00	\$685.00
5/1/2023	Abbie Pugh	Attend weekly team meeting with T, Aganga-Williams, J. Selendy and others re litigation strategy.	1.9	\$685.00	\$1,301.50
5/1/2023	Tesla Seri	Attend weekly team meeting with J. Selendy, T. Aganga-Williams and others re discovery and upcoming work streams.	1.8	\$570.00	\$1,026.00
5/1/2023	Scott Siegel	Review and update case files.	1.6	\$570.00	\$912.00
5/5/2023	Jennifer M Selendy	Review and comment on team workstream plan.	0.3	\$2,060.00	\$618.00
5/5/2023	Scott Siegel	Review and update case files.	1.3	\$570.00	\$741.00
5/8/2023	Jennifer M Selendy	Lead weekly team meeting to overview workstreams.	0.6	\$2,060.00	\$1,236.00
5/8/2023	Temidayo Aganga-Williams	Attend weekly team meeting with J. Selendy, C. O'Brien, R. Slepoy, K. Chen, and A. Pugh regarding upcoming work streams.	0.7	\$1,435.00	\$1,004.50
5/8/2023	Alvaro Rodrigo Mon-Cu	Attend and participate in weekly team meeting with J. Selendy, T. Aganga-Williams, C. O'Brien, and others to discuss upcoming discovery and other workstreams.	1.0	\$1,190.00	\$1,190.00
5/8/2023	Claire O'Brien	Update case tracker with status of ongoing and future workstreams (1.0); attend weekly team meeting with J. Selendy, T. Aganga-Williams and others regarding ongoing workstreams (1.0).	2.0	\$1,250.00	\$2,500.00

FEES

Date	Person	Description of Services	Hours	Rate	Amount
30 - Case administration					
5/8/2023	Kayla Chen	Review and analyze all timelines for internal workstreams (.2); prepare for weekly team meeting (.2); attend weekly team meeting with J. Selendy, T. Aganga-Williams, C. O'Brien, A. Mon Cureno, R. Slepoy, A. Pugh, T. Goodrich (1.0).	1.4	\$685.00	\$959.00
5/8/2023	Rachel Slepoy	Attend weekly team meeting with J. Selendy, T. Aganga-Williams, C. O'Brien, A. Mon Cureño, Z. Mitchell, K. Chen, A. Pugh, and T. Seri regarding strategy for discovery and other matters.	0.8	\$775.00	\$620.00
5/8/2023	Zachary Mitchell	Attend weekly SGE meeting with J. Selendy, T. Aganga-Williams and others re discovery strategy and workstreams.	1.0	\$685.00	\$685.00
5/8/2023	Abbie Pugh	Attend weekly team meeting with J. Selendy, T. Aganga-Williams, C. O'Brien and others re discovery and litigation strategy.	0.7	\$685.00	\$479.50
5/8/2023	Tesla Seri	Attend weekly meeting with J. Selendy, T. Aganga-Williams, and others to discuss case progress (1.0); review correspondence from C. O'Brien re weekly team meeting workstream tracker (.1).	1.1	\$570.00	\$627.00
5/8/2023	Scott Siegel	Review and organize files (.8); create binders of discovery documents for attorney review (5.2).	6.0	\$570.00	\$3,420.00
5/9/2023	Kayla Chen	Review and analyze Series B Holders' filings (.2); review and analyze other new docket filings (.3).	0.5	\$685.00	\$342.50
5/10/2023	Kayla Chen	Review and analyze new docket filings.	0.1	\$685.00	\$68.50
5/11/2023	Rachel Slepoy	Review notable recent docket filings by Preferred Equity.	0.1	\$775.00	\$77.50
5/12/2023	Rachel Slepoy	Emails with B. Stewart re finance workflow.	0.1	\$775.00	\$77.50
5/15/2023	Faith E. Gay	Attend weekly team status call with J. Selendy, T. Aganga-Williams and others (.5); confer with C. O'Brien and other team members re strategy questions (.6).	1.1	\$2,060.00	\$2,266.00
5/15/2023	Temidayo Aganga-Williams	Attend weekly team meeting with J. Selendy, C. Obrien, R. Slepoy, K. Chen, A. Mon Cureno and Z. Mitchell re upcoming workstreams.	0.5	\$1,435.00	\$717.50
5/15/2023	Alvaro Rodrigo Mon-Cu	Attend and participate in weekly team meeting with J. Selendy, T. Aganga-Williams, C. O'Brien, K. Chen, and others to discuss third party discovery and discovery from the Series B Preferred Shareholders.	0.5	\$1,190.00	\$595.00

FEES

Date	Person	Description of Services	Hours	Rate	Amount
30 - Case administration					
5/15/2023	Claire O'Brien	Attend weekly SGE internal meeting re ongoing workstreams including ongoing discovery for substantive consolidation litigation.	1.3	\$1,250.00	\$1,625.00
5/15/2023	Claire O'Brien	Update case tracker with workstream status.	0.5	\$1,250.00	\$625.00
5/15/2023	Kayla Chen	Review and update workstream case tracker (.1); attend weekly meeting with J. Selendy, T. Aganga-Williams, C. O'Brien, A. Mon Cureno, Z. Mitchell, R. Slepoy and A. Pugh on ongoing workstreams (.5); meet with C. O'Brien, A. Mon Cureno, Z. Mitchell, R. Slepoy and A. Pugh re fact development strategy next workstreams (.8).	1.5	\$685.00	\$1,027.50
5/15/2023	Rachel Slepoy	Attend weekly team strategy meeting with J. Selendy, T. Aganga-Williams, C. O'Brien, A. Mon Cureno, K. Chen, Z. Mitchell, and A. Pugh (0.5); discuss plan for core case issues strategy meeting with C. O'Brien, A. Mon Cureno, K. Chen, Z. Mitchell, A. Pugh (0.9).	1.4	\$775.00	\$1,085.00
5/15/2023	Zachary Mitchell	Attend weekly SGE team meeting with J. Selendy, T. Aganga-Williams, R. Slepoy, K. Chen, A. Mon Cureno, C. O'Brien, and A. Pugh re ongoing discovery workstreams and upcoming core factual issues presentation.	1.3	\$685.00	\$890.50
5/15/2023	Abbie Pugh	Weekly team meeting with C. O'Brien, A. Mon Cureno and others to discuss case strategy and discovery.	0.5	\$685.00	\$342.50
5/17/2023	Claire O'Brien	Call with J. Selendy re case administration matters.	0.3	\$1,250.00	\$375.00
5/17/2023	Kayla Chen	Correspond with managing clerks office on calendaring dates (.5), attend and take notes at May omnibus for any relevant case updates (.5), correspond with J. Selendy, T. Aganga-Williams and full team re same (.3).	1.3	\$685.00	\$890.50
5/17/2023	Scott Siegel	Review and update case files.	0.5	\$570.00	\$285.00
5/18/2023	Temidayo Aganga-Williams	Review draft task list.	0.2	\$1,435.00	\$287.00
5/18/2023	Claire O'Brien	Update case documents.	2.0	\$1,250.00	\$2,500.00
5/18/2023	Christopher Journey	Review of docket; download, review, and format 76 recent docket entries to update iManage docket folder.	4.2	\$570.00	\$2,394.00
5/18/2023	Scott Siegel	Review recent emails and update case files/folders on imanage.	2.3	\$570.00	\$1,311.00
5/19/2023	Jennifer M Selendy	Review budget for sub con litigation (.5); confer with White & Case re same (.3).	0.8	\$2,060.00	\$1,648.00

FEES

Date	Person	Description of Services	Hours	Rate	Amount
<u>30 - Case administration</u>					
5/19/2023	Claire O'Brien	Draft budgets for substantive consolidation litigation.	0.4	\$1,250.00	\$500.00
5/19/2023	Scott Siegel	Review and update case folders on Imanage.	0.7	\$570.00	\$399.00
5/22/2023	Temidayo Aganga-Williams	Meet with J. Selendy, C. O'Brien, A. Mon Cureno re subcon and discovery.	0.9	\$1,435.00	\$1,291.50
5/22/2023	Alvaro Rodrigo Mon-Cu	Attend and participate in weekly team meeting with J. Selendy, T. Aganga-Williams, C. O'Brien and others (SGE) to discuss substantive consolidation and discovery.	0.8	\$1,190.00	\$952.00
5/22/2023	Claire O'Brien	Update case tracker with status of ongoing workstreams (.5), attend weekly SGE team meeting with J. Selendy, T. Aganga-Williams, and others re status and updates on ongoing workstreams (1.0), meet with R. Slepoy, A. Pugh, A. Mon Cureno, K. Chen, and Z. Mitchell re substantive consolidation workstreams (.5).	2.0	\$1,250.00	\$2,500.00
5/22/2023	Kayla Chen	Meet with C. O'Brien, A. Mon Cureno, R. Slepoy and others re key case issue workstreams (.3), Weekly team meeting with J. Selendy, T. Aganga-Williams, C. O'Brien and others (.9).	1.2	\$685.00	\$822.00
5/22/2023	Rachel Slepoy	Meet C. O'Brien, A. Mon Cureno and others to discuss upcoming work product (0.3); meet J. Selendy, T. Aganga-Williams and others re strategy for subcon workstreams (0.9).	1.2	\$775.00	\$930.00
5/22/2023	Zachary Mitchell	Meet with C. O'Brien, K. Chen, A. Mon Cureno, and R. Slepoy re core factual issues (.5); attend weekly team meeting with SGE team, including J. Selendy and T. Aganga-Williams, on recent discovery requests and associated workstreams (.8).	1.3	\$685.00	\$890.50
5/22/2023	Tesla Seri	Attend weekly internal team meeting with J. Selendy, T. Aganga-Williams, C. O'Brien, and others.	1.0	\$570.00	\$570.00
5/22/2023	Christopher Journey	File docket filings to iManage for attorney review.	0.3	\$570.00	\$171.00
5/23/2023	Scott Siegel	Review recent emails and update case files/folders on imanage.	1.2	\$570.00	\$684.00
5/24/2023	Zachary Mitchell	Discuss upcoming work product with C. O'Brien, A. Pugh, K. Chen, and T. Seri.	0.2	\$685.00	\$137.00
5/24/2023	Christopher Journey	File docket filings to iManage for attorney review.	0.8	\$570.00	\$456.00
5/25/2023	Jennifer M Selendy	Confer with C. O'Brien re protective order.	0.6	\$2,060.00	\$1,236.00
5/25/2023	Temidayo Aganga-Williams	Review protective order.	0.3	\$1,435.00	\$430.50

FEES

Date	Person	Description of Services	Hours	Rate	Amount
<u>30 - Case administration</u>					
5/25/2023	Claire O'Brien	Draft email to SGE team regarding status of ongoing workstreams and deadlines for upcoming litigation.	1.2	\$1,250.00	\$1,500.00
5/25/2023	Claire O'Brien	Review and analyze protective order.	0.6	\$1,250.00	\$750.00
5/25/2023	Rachel Slepoy	Review and revise pending workstreams email from C. O'Brien.	0.3	\$775.00	\$232.50
5/25/2023	Christopher Journey	File docket filings to iManage for attorney review.	0.6	\$570.00	\$342.00
5/26/2023	Temidayo Aganga-Willis	Communicate with J. Selendy, C. Obrien and Series B counsel regarding case protective order.	0.2	\$1,435.00	\$287.00
5/26/2023	Claire O'Brien	Email with counsel for equity holders and J. Selendy re protective order (.6), Review and execute joinder to PO (.3).	0.9	\$1,250.00	\$1,125.00
5/26/2023	Christopher Journey	Update docket folder with review of past month's filings.	1.6	\$570.00	\$912.00
5/26/2023	Scott Siegel	Review and update case files.	1.3	\$570.00	\$741.00
5/29/2023	Claire O'Brien	Email R. Slepoy, A. Mon Cureno, K. Chen, Z. Mitchell re status of workstreams.	0.3	\$1,250.00	\$375.00
5/30/2023	Temidayo Aganga-Willis	Communicate with C. O'Brien re outstanding tasks.	0.2	\$1,435.00	\$287.00
5/30/2023	Claire O'Brien	Email with T. Chen re production review database (.4), Email with J. Selendy and F. Gay re case strategy meeting (.4).	0.8	\$1,250.00	\$1,000.00
5/30/2023	Kayla Chen	Meet with C. O'Brien, R. Slepoy, Z. Mitchell and others for associates team meeting re workstreams.	1.2	\$685.00	\$822.00
5/30/2023	Christopher Journey	File docket filings to iManage for attorney review.	1.9	\$570.00	\$1,083.00
5/30/2023	Eric Cohen	Create Dropbox link for data transfer.	0.1	\$350.00	\$35.00
5/31/2023	Scott Siegel	Update case files.	0.6	\$570.00	\$342.00
Subtotal for: 30 - Case administration			73.8		\$65,221.00

40 - Case strategy

5/2/2023	Temidayo Aganga-Willis	Call with S. Hershey, R. Slepoy, and A. Mon Cureno regarding upcoming filings (.4), Review court filings regarding substantive consolidation and related issues(1.3).	1.7	\$1,435.00	\$2,439.50
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Date	Person	Description of Services	Hours	Rate	Amount
40 - Case strategy					
5/2/2023	Tesla Seri	Review correspondence from J. Selendy re Debtors' Motion Seeking Entry of Order Substantively Consolidating Estates.	0.1	\$570.00	\$57.00
5/3/2023	Temidayo Aganga-Williams	Meet with J. Selendy, A. Mon Cureno, C. O'Brien, Z. Mitchell, and White and Case team regarding Committee case strategy.	0.4	\$1,435.00	\$574.00
5/3/2023	Alvaro Rodrigo Mon-Cu	Attend and participate in call with White & Case, C. O'Brien, T. Aganga-Williams, and J. Selendy to discuss UCC case strategy and discovery.	0.5	\$1,190.00	\$595.00
5/3/2023	Claire O'Brien	Call with S. Hershey, J. Weedman, A. Mon Cureno, T. Aganga-Williams, J. Selendy, D. Turetsky re Committee case strategy (.4); call with K. Chen re class claim (.5).	0.9	\$1,250.00	\$1,125.00
5/3/2023	Kayla Chen	Call with C. O'Brien re all claims procedural mechanisms (.5); research and analyze litigation trusts and current Plan provided litigation trust (.7); research and analyze UCC Class Claim and related filings and statutory provisions (.9); draft memo re claims procedural mechanisms (2.1).	5.2	\$685.00	\$3,562.00
5/4/2023	Alvaro Rodrigo Mon-Cu	Review K.Chen research UCC class claim and potential litigation trust claims.	0.2	\$1,190.00	\$238.00
5/4/2023	Claire O'Brien	Review analysis of class claim and comment on the same.	0.4	\$1,250.00	\$500.00
5/4/2023	Kayla Chen	Correspond with C. O'Brien on claims procedures research (.2); draft and update memo re the same (3.3).	3.5	\$685.00	\$2,397.50
5/9/2023	Zachary Mitchell	Correspond with T. Aganga-Williams re legal standards for briefed legal issue.	0.2	\$685.00	\$137.00
5/12/2023	Temidayo Aganga-Williams	Review and analyze filing re equity committee requests.	0.3	\$1,435.00	\$430.50
5/15/2023	Alvaro Rodrigo Mon-Cu	Attend and participate in meeting with C. O'Brien, K. Chen, Z. Mitchell, R. Slepoy, and A. Pugh to discuss core case issues and case strategy.	0.6	\$1,190.00	\$714.00
5/15/2023	Alvaro Rodrigo Mon-Cu	Attend and participate in call with J. Selendy, T. Aganga-Williams, C. O'Brien, and White & Case to discuss case strategy and discovery.	0.5	\$1,190.00	\$595.00
5/15/2023	Claire O'Brien	Weekly call with J. Selendy, T. Aganga-Williams, A. Mon Cureno, and S. Hershey regarding Committee ongoing workstreams and strategy.	0.5	\$1,250.00	\$625.00

FEES

Date	Person	Description of Services	Hours	Rate	Amount
<u>40 - Case strategy</u>					
5/15/2023	Abbie Pugh	Team meeting with C. O'Brien, A. Mon Cureno and others re preparation for team strategy and analysis meeting.	0.8	\$685.00	\$548.00
5/18/2023	Temidayo Aganga-Williams	Call with S. Hershey regarding upcoming workstreams.	0.4	\$1,435.00	\$574.00
5/22/2023	Faith E. Gay	Attend Internal team strategy meeting with J. Selendy, T. Aganga-Williams and others re upcoming discovery.	0.9	\$2,060.00	\$1,854.00
5/22/2023	Jennifer M Selendy	Lead team meeting with F. Gay, T. Aganga-Williams, C. O'Brien and others to oversee workstreams and plan for next stage of discovery.	0.7	\$2,060.00	\$1,442.00
5/22/2023	Temidayo Aganga-Williams	Call with S. Hershey, J. Selendy, A. Mon Cureno, and C. O'Brien re upcoming workstreams and strategy.	0.5	\$1,435.00	\$717.50
5/22/2023	Temidayo Aganga-Williams	Communication with White and Case team regarding ongoing workstreams and strategy.	0.2	\$1,435.00	\$287.00
5/22/2023	Alvaro Rodrigo Mon-Cu	Draft email re strategy and response.	0.2	\$1,190.00	\$238.00
5/22/2023	Alvaro Rodrigo Mon-Cu	Attend and participate in meeting with J. Selendy, T. Aganga-Williams, C. O'Brien, and W&C team to discuss key case issues.	0.5	\$1,190.00	\$595.00
5/22/2023	Claire O'Brien	Call with S. Hershey, J. Selendy, A. Mon Cureno, and T. Aganga-Williams re ongoing workstreams.	0.4	\$1,250.00	\$500.00
5/22/2023	Zachary Mitchell	Draft and revise analysis regarding core case issues for team strategy and analysis meeting.	2.0	\$685.00	\$1,370.00
5/22/2023	Tesla Seri	Correspond with K. Chen re team fact development and strategy meeting.	0.4	\$570.00	\$228.00
5/23/2023	Alvaro Rodrigo Mon-Cu	Prepare product regarding core case issues for team strategy and analysis meeting (2.4).	2.4	\$1,190.00	\$2,856.00
5/23/2023	Claire O'Brien	Review and analyze documents for key case issues strategy meeting.	4.8	\$1,250.00	\$6,000.00
5/23/2023	Kayla Chen	Draft and revise work product analyzing core case issues for case strategy meeting (2.0), draft work product compilation for same (1.3).	3.3	\$685.00	\$2,260.50
5/23/2023	Zachary Mitchell	Draft work product for core factual and strategy issues meeting (2.3).	2.3	\$685.00	\$1,575.50
5/23/2023	Abbie Pugh	Continue drafting work product compilation re core case issues for team strategy and analysis meeting.	2.0	\$685.00	\$1,370.00

FEES

Date	Person	Description of Services	Hours	Rate	Amount
40 - Case strategy					
5/24/2023	Faith E. Gay	Review and analyze update materials from team core fact and strategy issues meeting (1.8); emails to J. Selendy, C. O'Brien and others re same (.5).	2.3	\$2,060.00	\$4,738.00
5/24/2023	Temidayo Aganga-Williams	Attend internal team fact development and strategy meeting re core case issues with J. Selendy, C. O'Brien, and others.	3.2	\$1,435.00	\$4,592.00
5/24/2023	Alvaro Rodrigo Mon-Cu	Attend internal team fact development and strategy meeting re core case issues with J. Selendy, T. Aganga-Williams, C. O'Brien, and others.	3.0	\$1,190.00	\$3,570.00
5/24/2023	Claire O'Brien	Attend internal team fact development and strategy meeting re core case issues with J. Selendy, T. Aganga-Williams, K. Chen and others (3.3), Prepare for case strategy and fact development meeting (.8).	4.1	\$1,250.00	\$5,125.00
5/24/2023	Kayla Chen	Draft and revise work product on core case issues for team strategy and analysis meeting (3.4), correspond with T. Seri re same (.2); attend internal team fact development and strategy meeting re core case issues with J. Selendy, T. Aganga-Williams, C. O'Brien, and others (3.2).	6.8	\$685.00	\$4,658.00
5/24/2023	Rachel Slepoy	Attend internal team fact development and strategy meeting re core case issues with J. Selendy, T. Aganga-Williams and others (3.1); prepare for same (0.2).	3.2	\$775.00	\$2,480.00
5/24/2023	Zachary Mitchell	Attend internal fact development and strategy meeting re core case issues with J. Selendy, T. Aganga-Williams, C. O'Brien and others.	3.4	\$685.00	\$2,329.00
5/24/2023	Abbie Pugh	Finalize work product re core case issues for team strategy and analysis meeting (1.4); team strategy and analysis meeting (3).	4.4	\$685.00	\$3,014.00
5/24/2023	Tesla Seri	Attend internal team fact development and strategy meeting re core case issues with J. Selendy, T. Aganga-Williams, C. O'Brien, and others.	3.3	\$570.00	\$1,881.00
5/25/2023	Jennifer M Selendy	Review and comment on renewed request by the Preferred Equity holders for a committee.	0.6	\$2,060.00	\$1,236.00
5/25/2023	Claire O'Brien	Call with S. Hershey re equity committee request letter.	0.1	\$1,250.00	\$125.00
5/25/2023	Claire O'Brien	Review and analyze Series B Preferred Holders renewed request for equity committee.	1.5	\$1,250.00	\$1,875.00
5/26/2023	Temidayo Aganga-Williams	Review UCC submissions re equity committee.	0.3	\$1,435.00	\$430.50

FEES

Date	Person	Description of Services	Hours	Rate	Amount
40 - Case strategy					
5/26/2023	Claire O'Brien	Call with S. Hershey re Committee's substantive consolidation litigation strategy.	0.1	\$1,250.00	\$125.00
5/30/2023	Temidayo Aganga-Williams	Call with J. Weedman, S. Hershey, and C. O'Brien re upcoming workstreams and strategy.	0.3	\$1,435.00	\$430.50
5/30/2023	Claire O'Brien	Call with S. Hershey re Committee's litigation strategy.	0.5	\$1,250.00	\$625.00
5/30/2023	Claire O'Brien	Meet with R. Slepoy, Z. Mitchell, K. Chen, A. Pugh, and T. Seri re substantive consolidation document and law strategy and substance.	1.6	\$1,250.00	\$2,000.00
5/30/2023	Claire O'Brien	Attend standing call with S. Hershey, J. Weedman, and T. Aganga-Williams re case strategy.	0.4	\$1,250.00	\$500.00
5/30/2023	Rachel Slepoy	Meet C. O'Brien, K. Chen and others re strategy for briefing (1.1); discuss strategy for briefing re substantive consolidation with Z. Mitchell (0.2).	1.3	\$775.00	\$1,007.50
5/31/2023	Faith E. Gay	Review and analyze pleadings to date relating to core strategy and fact issues meeting re trial in July.	2.2	\$2,060.00	\$4,532.00
5/31/2023	Claire O'Brien	Call with J. Selendy re certain case strategy matters.	0.4	\$1,250.00	\$500.00
Subtotal for: 40 - Case strategy			79.8		\$82,178.50
60 - Discovery and fact development					
5/1/2023	Temidayo Aganga-Williams	Review and analyze documents concerning Series B investors and debtors.	1.8	\$1,435.00	\$2,583.00
5/1/2023	Temidayo Aganga-Williams	Call with S. Hershey regarding Court's discovery order.	0.2	\$1,435.00	\$287.00
5/1/2023	Rachel Slepoy	Update draft discovery requests per comments from C. O'Brien and T. Aganga-Williams (2.7); discuss draft discovery requests with T. Aganga-Williams, C. O'Brien, Z. Mitchell, A. Pugh, T. Seri (1.0).	3.7	\$775.00	\$2,867.50
5/1/2023	Zachary Mitchell	Revise RFPs to incorporate comments from C. O'Brien (1.2); meet with T. Aganga-Williams re revisions to RFPs and upcoming discovery requests (.8).	2.0	\$685.00	\$1,370.00
5/1/2023	Abbie Pugh	Review and analyze documents re draft discovery requests to Preferred equity holders (.5); discuss same with R. Slepoy and Z. Mitchell (.1); discuss fact development work product with T. Seri (.3).	0.9	\$685.00	\$616.50

FEES

Date	Person	Description of Services	Hours	Rate	Amount
60 - Discovery and fact development					
5/1/2023	Tesla Seri	Confer with A. Pugh regarding fact development work product (.3); revise and edit fact development work product (3.1).	3.4	\$570.00	\$1,938.00
5/2/2023	Temidayo Aganga-Williams	Meet with R. Slepoy, A. Pugh, and A. Mon Cureno regarding discovery motions.	1.0	\$1,435.00	\$1,435.00
5/2/2023	Temidayo Aganga-Williams	Review and revise Series B investment work product compilation.	1.6	\$1,435.00	\$2,296.00
5/2/2023	Temidayo Aganga-Williams	Call with J. Selendy regarding upcoming discovery.	0.4	\$1,435.00	\$574.00
5/2/2023	Temidayo Aganga-Williams	Review filing concerning substantive consolidation, intercompany loans, and fraudulent transfer issues.	1.0	\$1,435.00	\$1,435.00
5/2/2023	Temidayo Aganga-Williams	Meet with C. O'Brien, A. Mon Cureno, Z. Mitchell, R. Slepoy, and A. Pugh re discovery requests.	2.9	\$1,435.00	\$4,161.50
5/2/2023	Alvaro Rodrigo Mon-Cu	Meet with R. Slepoy, A. Pugh, and T. Aganga-Williams to discuss first draft of RFPs for Westcap (1.4), Meet with C. O'Brien to discuss revisions to RFPs for Westcap (.5), Revise RFPs for Westcap to include requests for due diligence and financial model documents (.5), Call with C. O'Brien, T. Aganga-Williams, R. Slepoy, A. Pugh, and Z. Mitchell to discuss revised draft of RFPs for Westcap (2.7), Call with A. Pugh and R. Slepoy re revisions for RFPs for Westcap. (1.4).	6.5	\$1,190.00	\$7,735.00
5/2/2023	Claire O'Brien	Strategy call with T. Aganga-Williams, A. Mon Cureno, Z. Mitchell, A. Pugh, and R. Slepoy re discovery requests for substantive consolidation (2.8); meet with T. Aganga-Williams re discovery requests for substantive consolidation (.2); meet with A. Mon Cureno re discovery requests for substantive consolidation (.3).	3.3	\$1,250.00	\$4,125.00
5/2/2023	Rachel Slepoy	Discuss latest draft discovery requests with T. Aganga-Williams, S. Hershey, and A. Mon Cureño (0.6); revise and review same with T. Aganga-Williams, A. Mon Cureño, and A. Pugh (0.9); implement revisions to draft requests collaborating with A. Mon Cureño and A. Pugh (1.4); revert to discuss edits to same with T. Aganga-Williams, A. Mon Cureño, C. O'Brien, A. Pugh, and Z. Mitchell (2.2); review and finalize discovery draft circulated by C. O'Brien (0.2).	4.9	\$775.00	\$3,797.50

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Date	Person	Description of Services	Hours	Rate	Amount
60 - Discovery and fact development					
5/2/2023	Zachary Mitchell	Implement proposed revisions to draft RFPs with A. Mon Cureno and R. Slepoy (.6); meet with case team, including T. Aganga-Williams, to discuss edits to draft discovery requests and implement edits (2.6).	3.2	\$685.00	\$2,192.00
5/2/2023	Abbie Pugh	Review and analyze new production of documents from Debtors (.7); call with T. Aganga-Williams, R. Slepoy, and A. Mon Cureño re draft discovery requests (1.4); call with C. O'Brien, T. Aganga-Williams, R. Slepoy, A. Mon Cureño, and Z. Mitchell re revised draft discovery requests (2.5); call with R. Slepoy and A. Mon Cureño re revised draft discovery requests (1.3); review and analyze documents related to draft discovery requests (1).	6.9	\$685.00	\$4,726.50
5/3/2023	Jennifer M Selendy	Review and comment on draft 30(b)(6) notice.	0.5	\$2,060.00	\$1,030.00
5/3/2023	Temidayo Aganga-Williams	Review, analyze and revise discovery request concerning substantive consolidation.	0.8	\$1,435.00	\$1,148.00
5/3/2023	Temidayo Aganga-Williams	Meet with J. Selendy, A. Mon Cureno, and C. Obrien regarding discovery.	0.5	\$1,435.00	\$717.50
5/3/2023	Alvaro Rodrigo Mon-Cu	Attend and participate in call with C. O'Brien, T. Aganga-Williams, and J. Selendy to discuss Rule 2004 discovery.	0.6	\$1,190.00	\$714.00
5/3/2023	Alvaro Rodrigo Mon-Cu	Draft RFPs for Series B Preferred Holders.	4.8	\$1,190.00	\$5,712.00
5/3/2023	Claire O'Brien	Call with T. Aganga-Williams, J. Selendy, Z Mitchell, and A. Mon Cureno re discovery from preferred holders.	0.9	\$1,250.00	\$1,125.00
5/3/2023	Claire O'Brien	Draft 30b6 deposition notice for WestCap (2.4); revise draft of requests for admission (1.0).	3.4	\$1,250.00	\$4,250.00
5/3/2023	Zachary Mitchell	Revise RFPs to incorporate comments from J. Selendy and T. Aganga-Williams (.6); call with White & Case re Committee's discovery requests (.4); meet with C. O'Brien re discovery request assignments (.3); draft Requests for Admission (2.7).	4.0	\$685.00	\$2,740.00
5/3/2023	Abbie Pugh	Review and analyze core documents for substantive consolidation (1.3); draft summary of same (.1); review and analyze documents produced by Debtors for fact development (.6); discuss same with T. Seri (.1); call with C. O'Brien re discovery requests (.3).	2.4	\$685.00	\$1,644.00

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Date	Person	Description of Services	Hours	Rate	Amount
<u>60 - Discovery and fact development</u>					
5/3/2023	Tesla Seri	Confer with A. Pugh regarding Celsius document review (.1); confer with C. O'Brien regarding Celsius document review (.1); review documents relating to WestCap (8.0); correspondence with Celsius team members re key documents summaries(.6).	8.8	\$570.00	\$5,016.00
5/4/2023	Temidayo Aganga-Williams	Review and revise discovery requests concerning Series B holders.	2.4	\$1,435.00	\$3,444.00
5/4/2023	Alvaro Rodrigo Mon-Cu	Review and revise discovery documents (RFAs, RFPs, and 30(b)(6) notices) to be served on Series B Preferred Holders (4.4); review draft R&O's to Series B Preferred Holders Interrogatories (1.3).	5.7	\$1,190.00	\$6,783.00
5/4/2023	Claire O'Brien	Email with J. Selendy, Z. Mitchell, K. Chen, and R. Slepoy re documents produced by Debtors (.6); review and revise discovery drafts to WestCap(.7).	1.3	\$1,250.00	\$1,625.00
5/4/2023	Kayla Chen	Review and analyze RFAs (.1); review and analyze documents produced in discovery (.3).	0.4	\$685.00	\$274.00
5/4/2023	Rachel Slepoy	Review latest drafts of discovery requests (0.4); review documents produced in discovery (0.6).	1.0	\$775.00	\$775.00
5/4/2023	Zachary Mitchell	Revise draft RFAs (2.9); meet with A. Zhang and T. Burke re draft RFAs (.3).	3.2	\$685.00	\$2,192.00
5/4/2023	Abbie Pugh	Research and analysis re written discovery requests and requests for production (1.1); review drafts of same (.1); discuss edits to same with T. Aganga-Williams.	1.3	\$685.00	\$890.50
5/4/2023	Tesla Seri	Review documents to identify key documents and categorize by issue (8.1); correspond with A. Pugh regarding document review and related work product (.2); draft summary of documents produced in discovery (.6); correspondence with R. Slepoy regarding key documents (.2).	9.1	\$570.00	\$5,187.00
5/4/2023	Andrew Zhang	Analyze investment documents for fact development purposes.	1.4	\$630.00	\$882.00
5/4/2023	Tyler Burke	Research Series B investment information (1.9); Communicate with Z. Mitchell re financial information for draft RFAs (0.3).	2.2	\$685.00	\$1,507.00
5/5/2023	Jennifer M Selendy	Review discovery requests served on the Committee by the Preferred Equity holders.	0.9	\$2,060.00	\$1,854.00
5/5/2023	Temidayo Aganga-Williams	Communication with S. Hershey re open discovery.	0.2	\$1,435.00	\$287.00
5/5/2023	Temidayo Aganga-Williams	Review discovery requests from Series B holders.	0.3	\$1,435.00	\$430.50

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Date	Person	Description of Services	Hours	Rate	Amount
<u>60 - Discovery and fact development</u>					
5/5/2023	Temidayo Aganga-Willis	Reviewing CNL documents.	0.3	\$1,435.00	\$430.50
5/5/2023	Claire O'Brien	Draft documents related to Series B responses to UCC discovery requests.	1.6	\$1,250.00	\$2,000.00
5/5/2023	Claire O'Brien	Call with R. Slepoy re R&Os to discovery requests (.2); review and comment on draft R&Os to preferred equity RFPs (1.0); call with R. Slepoy, K. Chen, and Z. Mitchell re talking points for discovery meet-and-confer (.4); emails with S. Hershey and J. Selendy re discovery requests from Preferred Equity Holders (.8).	2.4	\$1,250.00	\$3,000.00
5/5/2023	Kayla Chen	Call with C. O'Brien, R. Slepoy, Z. Mitchell re discovery responses (.3); review and analyze Debtor and UCC subcon briefing for related work product (1.1).	1.4	\$685.00	\$959.00
5/5/2023	Kayla Chen	Review and analyze amended case management procedures for procedures re potential responses related to Series B discovery (.4); draft documents for the same (.3).	0.7	\$685.00	\$479.50
5/5/2023	Rachel Slepoy	Draft responses and objections to discovery requests (4.0); discuss same with C. O'Brien (0.2); discuss discovery with C. O'Brien, K. Chen, and Z. Mitchell (0.4); revise draft R&Os based on comments from C. O'Brien (0.5); review draft talking points circulated by Z. Mitchell (0.1).	5.2	\$775.00	\$4,030.00
5/5/2023	Zachary Mitchell	Meet with C. O'Brien, R. Slepoy, and K. Chen re requests served by Series B Preferred investors (.4); draft talking points for upcoming meet and confer with support and reasoning for Committee's RFPs (5.8).	6.2	\$685.00	\$4,247.00
5/5/2023	Abbie Pugh	Review draft talking points re discovery requests (.1); review and analyze documents from fact development re same (.1).	0.2	\$685.00	\$137.00
5/5/2023	Tesla Seri	Review documents to identify key documents and categorize by issue (6.10); correspond with Z. Mitchell and A. Pugh re discovery talking points (.2); review key documents for work product. (2.5).	8.7	\$570.00	\$4,959.00
5/6/2023	Zachary Mitchell	Draft discovery talking points for upcoming meet and confer.	5.7	\$685.00	\$3,904.50
5/7/2023	Jennifer M Selendy	Review and comment on responses and objections to the Preferred Equity holders' interrogatories and requests for production.	1.2	\$2,060.00	\$2,472.00

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Date	Person	Description of Services	Hours	Rate	Amount
60 - Discovery and fact development					
5/7/2023	Alvaro Rodrigo Mon-Cu	Revise talking points for anticipated discovery meet and confers with Series B Preferred Shareholders.	0.9	\$1,190.00	\$1,071.00
5/7/2023	Claire O'Brien	Review and revise draft responses and objections to discovery served by preferred equity holders (2.8); email with Z. Mitchell, A. Mon Cureno, and R. Slepoy regarding discovery requests for substantive consolidation (.4).	3.2	\$1,250.00	\$4,000.00
5/7/2023	Rachel Slepoy	Discuss revisions to draft discovery responses with C. O'Brien.	0.1	\$775.00	\$77.50
5/7/2023	Zachary Mitchell	Revise draft discovery talking points re RFPs to include potential tailoring of each request.	0.6	\$685.00	\$411.00
5/7/2023	Tesla Seri	Review and analyze documents to identify key documents and categorize by issue.	2.8	\$570.00	\$1,596.00
5/8/2023	Jennifer M Selendy	Review and comment on UCC responses and objections prepared by White & Case.	0.6	\$2,060.00	\$1,236.00
5/8/2023	Claire O'Brien	Confer with R. Slepoy re R&O drafts (.3); email with Series B Preferred Holders counsel regarding served discovery (.4); review and comment on responses and objections to series b preferred holders discovery requests (1.1).	1.8	\$1,250.00	\$2,250.00
5/8/2023	Kayla Chen	Research and analyze procedural mechanisms for responses related to Series B discovery (1.1); correspond with C. O'Brien re same (.1); research and analyze documents re same (.7).	1.9	\$685.00	\$1,301.50
5/8/2023	Rachel Slepoy	Discuss discovery responses with C. O'Brien (0.5); implement edits suggested by same (4.0).	4.5	\$775.00	\$3,487.50
5/8/2023	Zachary Mitchell	Revise draft discovery talking points.	3.9	\$685.00	\$2,671.50
5/8/2023	Abbie Pugh	Review and analyze documents for fact development (1.4); add to fact development work product re same (.1); prepare documents for production (.2); emails with C. O'Brien re same (.1).	1.8	\$685.00	\$1,233.00
5/8/2023	Abbie Pugh	Review, analyze, and compile documents for work product re preferred equity holders' documents (2.5); emails with S. Siegel, R. Slepoy, and C. O'Brien re same (.4).	2.9	\$685.00	\$1,986.50
5/8/2023	Tesla Seri	Review and analyze documents to identify key documents and to categorize documents by issue.	10.9	\$570.00	\$6,213.00
5/8/2023	Eddie Rivera	Prepare binder and materials supporting attorney work product documents.	2.1	\$570.00	\$1,197.00

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Date	Person	Description of Services	Hours	Rate	Amount
60 - Discovery and fact development					
5/8/2023	Yury La Fontaine	Manage data/files for discovery work product as requested by C. O'Brien for document production.	0.5	\$350.00	\$175.00
5/8/2023	Yury La Fontaine	Prepare documents as requested by A. Pugh for document production.	1.2	\$350.00	\$420.00
5/9/2023	Jennifer M Selendy	Coordination call with T. Aganga-Williams, C. O'Brien and White & Case re discovery responses.	0.5	\$2,060.00	\$1,030.00
5/9/2023	Temidayo Aganga-Williams	Call with S. Hershey, J. Weedman, J. Selendy and others re responses to discovery requests.	0.6	\$1,435.00	\$861.00
5/9/2023	Alvaro Rodrigo Mon-Cu	Review and revise talking points for upcoming discovery meet and confers with Series B Preferred Shareholders (4.0); attend and participate in call with J. Selendy, T. Aganga-Williams, C. O'Brien, R. Slepoy, and White & Case to discuss discovery responses (.6).	4.6	\$1,190.00	\$5,474.00
5/9/2023	Claire O'Brien	Call with S. Hershey, J. Weedman, J. Selendy, T. Aganga-Williams, R. Slepoy, A. Mon Cureno re responses to Preferred Equity discovery requests.	0.6	\$1,250.00	\$750.00
5/9/2023	Kayla Chen	Correspond with C. O'Brien and A. Pugh re documents produced in discovery (.6); review and analyze documents produced in discovery (2.6).	3.2	\$685.00	\$2,192.00
5/9/2023	Rachel Slepoy	Meet J. Selendy, T. Aganga-Williams, C. O'Brien, A. Mon Cureño, J. Weedman, and S. Hershey to discuss responses to discovery requests (0.6); discuss outstanding discovery tasks with C. O'Brien and Z. Mitchell (0.1).	0.7	\$775.00	\$542.50
5/9/2023	Abbie Pugh	Correspond with T. Burke and K. Chen re documents concerning Series B investment.	0.3	\$685.00	\$205.50
5/9/2023	Tesla Seri	Review documents to identify key documents and to categorize documents by issue (8.3); draft and distribute key documents internal summary. (.3).	8.6	\$570.00	\$4,902.00
5/10/2023	Temidayo Aganga-Williams	Meeting with J. Selendy, C. Obrien and A. Mon Cureno re discovery requests.	0.5	\$1,435.00	\$717.50
5/10/2023	Alvaro Rodrigo Mon-Cu	Review and revise talking points for upcoming meet and confers with Series B Preferred Shareholders (3.7); attend and participate in call with C. O'Brien, J. Selendy, and T. Aganga-Williams re Rule 2004 discovery (.2).	3.9	\$1,190.00	\$4,641.00

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Date	Person	Description of Services	Hours	Rate	Amount
<u>60 - Discovery and fact development</u>					
5/10/2023	Claire O'Brien	Review and revise draft R&Os to preferred equity discovery requests.	2.1	\$1,250.00	\$2,625.00
5/10/2023	Kayla Chen	Call with R. Slepoy, Z. Mitchell, A. Pugh, T. Goodrich re discovery related to Series B Holders (.8); review notable documents from discovery (1.0); draft and send discovery summary to J. Selendy, T. Aganga-Williams and full team (.4).	2.2	\$685.00	\$1,507.00
5/10/2023	Rachel Slepoy	Review notable documents (0.7); meet A. Pugh, Z. Mitchell, and K. Chen re document review (0.8); revise and combine discovery responses (3.0).	4.5	\$775.00	\$3,487.50
5/10/2023	Zachary Mitchell	Review and analyze hot documents (1.2); call with A. Pugh, R. Slepoy, and K. Chen re document review (.8).	2.0	\$685.00	\$1,370.00
5/10/2023	Abbie Pugh	Review and analyze documents produced by Debtors for fact development (2.5); update draft work product re same (.2); call with T. Seri re fact development and strategy for analysis of documents (2.2).	4.9	\$685.00	\$3,356.50
5/10/2023	Tesla Seri	Review documents to identify key documents and to categorize documents by issue (9.7); meet with A. Pugh re document review strategy (2.3).	12.0	\$570.00	\$6,840.00
5/11/2023	Temidayo Aganga-Williams	Call with A. Mon Cureno re discovery filing.	0.1	\$1,435.00	\$143.50
5/11/2023	Temidayo Aganga-Williams	Revise discovery responses and objections concerning Series B.	0.3	\$1,435.00	\$430.50
5/11/2023	Alvaro Rodrigo Mon-Cu	Review and revise talking points for upcoming meet and confers with Series B Preferred Shareholders.	0.5	\$1,190.00	\$595.00
5/11/2023	Claire O'Brien	Email with J. Selendy, S. Hershey, and R. Slepoy re R&Os to Series B Preferred Holders' discovery requests (.6); review Series B Preferred Holders' R&Os to 30b6 deposition notices (.6).	1.0	\$1,250.00	\$1,250.00
5/11/2023	Kayla Chen	Review and analyze documents produced in discovery.	0.3	\$685.00	\$205.50
5/11/2023	Rachel Slepoy	Revise and finalize draft discovery responses.	1.0	\$775.00	\$775.00
5/11/2023	Zachary Mitchell	Revise draft discovery talking points to implement edits from A. Mon Cureno.	0.9	\$685.00	\$616.50
5/11/2023	Tesla Seri	Review documents to identify and categorize key communications (11.4), Draft key document summary (.6).	12.0	\$570.00	\$6,840.00

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Date	Person	Description of Services	Hours	Rate	Amount
<u>60 - Discovery and fact development</u>					
5/12/2023	Jennifer M Selendy	Review Preferred Equity holders' responses and objections and strategize for meet and confer.	0.4	\$2,060.00	\$824.00
5/12/2023	Jennifer M Selendy	Finalize UCC responses and objections.	0.4	\$2,060.00	\$824.00
5/12/2023	Kayla Chen	Review and analyze documents produced in discovery.	0.3	\$685.00	\$205.50
5/12/2023	Kayla Chen	Review and analyze work product for potential responses to Series B discovery.	0.3	\$685.00	\$205.50
5/12/2023	Zachary Mitchell	Review hot documents (.6); update work product with documents produced in discovery (1.6); revise discovery talking points to incorporate edits from A. Mon Cureno (3.9); draft summary of document review scope (.6).	6.7	\$685.00	\$4,589.50
5/12/2023	Abbie Pugh	Update fact development work product (.1); review and analyze documents sent by T. Seri for same (.1).	0.2	\$685.00	\$137.00
5/12/2023	Tesla Seri	Review documents to identify key communications and organize them into categories (8.0); draft key document summary (.3); edit key document work product (1.2).	9.7	\$570.00	\$5,529.00
5/13/2023	Zachary Mitchell	Revise draft discovery talking points.	5.5	\$685.00	\$3,767.50
5/14/2023	Alvaro Rodrigo Mon-Cu	Revise talking points for meet and confer with Series B Preferred Shareholders.	2.0	\$1,190.00	\$2,380.00
5/14/2023	Zachary Mitchell	Revise meet and confer talking points.	1.7	\$685.00	\$1,164.50
5/15/2023	Temidayo Aganga-Willis	Call with S. Hershey re subcon discovery.	0.4	\$1,435.00	\$574.00
5/15/2023	Temidayo Aganga-Willis	Review substantive consolidation-related discovery filings.	2.0	\$1,435.00	\$2,870.00
5/15/2023	Claire O'Brien	Draft work product for core case issues strategy meeting.	0.5	\$1,250.00	\$625.00
5/15/2023	Kayla Chen	Review and analyze documents for subcon arguments.	0.8	\$685.00	\$548.00
5/15/2023	Zachary Mitchell	Prepare substantive materials for core factual and strategy issues meeting.	1.2	\$685.00	\$822.00
5/15/2023	Zachary Mitchell	Revise discovery talking points to incorporate revisions from A. Mon Cureno.	1.8	\$685.00	\$1,233.00
5/16/2023	Temidayo Aganga-Willis	Review and analyze talking points re meet and confer (.8); prepare for meet and confer with series B holders (1.8).	2.6	\$1,435.00	\$3,731.00

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Date	Person	Description of Services	Hours	Rate	Amount
<u>60 - Discovery and fact development</u>					
5/16/2023	Alvaro Rodrigo Mon-Cu	Revise and edit talking points for meet and confer with Series B Preferred Shareholders (1.1); call with C. O'Brien to discuss strategy re meet and confer with Series B Preferred Shareholders. (.5).	1.6	\$1,190.00	\$1,904.00
5/16/2023	Claire O'Brien	Call with A. Mon Cureno re Series B Preferred Holders' R&Os to substantive consolidation discovery requests (.6); prepare for meet-and-confer with Series B Preferred Holders regarding discovery requests for substantive consolidation (2.9); confer with A. Pugh re interesting documents (.1).	3.6	\$1,250.00	\$4,500.00
5/16/2023	Claire O'Brien	Review and analyze documents for core case issues meeting.	1.1	\$1,250.00	\$1,375.00
5/16/2023	Kayla Chen	Review and analyze documents regarding core case issues for team strategy and analysis meeting.	0.4	\$685.00	\$274.00
5/16/2023	Kayla Chen	Draft potential responses to Series B Preferred Holders discovery.	0.2	\$685.00	\$137.00
5/16/2023	Abbie Pugh	Review and analyze documents produced by Debtors for fact development (4.9); draft email to team analyzing same (.1); draft analysis of documents for fact development work product (.5).	5.5	\$685.00	\$3,767.50
5/16/2023	Abbie Pugh	Email correspondence with T. Chen re Relativity database (.3); troubleshoot document database issues and identify newly-produced documents and translation information re same (.5).	0.8	\$685.00	\$548.00
5/16/2023	Abbie Pugh	Draft analysis of fact development regarding core case issues for team strategy and analysis meeting.	0.3	\$685.00	\$205.50
5/16/2023	Tesla Seri	Review correspondence from A. Pugh re pref communications (.1); correspondence with K. Chen re pref due diligence (.1).	0.2	\$570.00	\$114.00
5/17/2023	Jennifer M Selendy	Review notable documents relating to Preferred Equity holders' investment.	3.2	\$2,060.00	\$6,592.00
5/17/2023	Temidayo Aganga-Willis	Preparation regarding upcoming meet and confer.	2.1	\$1,435.00	\$3,013.50
5/17/2023	Temidayo Aganga-Willis	Meet and confer with debtors re substantive consolidation discovery.	0.5	\$1,435.00	\$717.50
5/17/2023	Temidayo Aganga-Willis	Call with S. Hershey, C. O'Brien and J. Weedman re upcoming workstreams.	0.2	\$1,435.00	\$287.00

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Date	Person	Description of Services	Hours	Rate	Amount
<u>60 - Discovery and fact development</u>					
5/17/2023	Temidayo Aganga-Williams	Meeting with C. Brien and A. Mon Cureno regarding preparation for meet and confer with Series B.	0.6	\$1,435.00	\$861.00
5/17/2023	Temidayo Aganga-Williams	Meet and confer with Series B Preferred Holders Counsel re substantive consolidation discovery.	1.5	\$1,435.00	\$2,152.50
5/17/2023	Temidayo Aganga-Williams	Review document summaries related to Series B Pref.	1.1	\$1,435.00	\$1,578.50
5/17/2023	Alvaro Rodrigo Mon-Cu	Meet with C. O'Brien and T. Aganga-Williams to discuss strategy for meet and confer with Series B Preferred Shareholders (.5); attend and participate in meet and confer with C. O'Brien, J. Selendy, Z. Mitchell, T. Aganga-Williams, W&C, and Series B Preferred Shareholders (1.8); attend and participate in call with S. Hershey of White and Case, J. Selendy, and T. Aganga-Williams to discuss discovery for Series B Preferred Shareholders (.5); research timing requirements for Rule 2004 discovery and UCC standing requirements for bankruptcy claims (1.9).	4.7	\$1,190.00	\$5,593.00
5/17/2023	Claire O'Brien	Review and analyze documents for core case issues meeting.	0.4	\$1,250.00	\$500.00
5/17/2023	Claire O'Brien	Prepare for meet-and-confer with counsel for Series B holders (.6); meeting with T. Aganga-Williams and A. Mon Cureno re prep for meet-and-confer with Series B Holders (.6); attend meet-and-confer with Series B Holders regarding substantive consolidation discovery requests (1.5); attend meet-and-confer with debtors regarding discovery and R&Os exchanged between debtors and UCC (.6).	3.4	\$1,250.00	\$4,250.00
5/17/2023	Kayla Chen	Review and analyze documents for meet and confer with Series B Holders (.5), review and analyze documents re core case issues for team strategy and analysis meeting (2.2) call with T. Goodrich re same (.5).	3.2	\$685.00	\$2,192.00
5/17/2023	Kayla Chen	Draft potential responses to Series B Preferred Holders discovery.	0.8	\$685.00	\$548.00
5/17/2023	Rachel Slepoi	Review notable documents.	0.1	\$775.00	\$77.50
5/17/2023	Zachary Mitchell	Attend meet-and-confer re discovery requests under Scheduling Order.	2.2	\$685.00	\$1,507.00

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Date	Person	Description of Services	Hours	Rate	Amount
<u>60 - Discovery and fact development</u>					
5/17/2023	Abbie Pugh	Review and analyze documents for fact development (1.7); draft summary of same (.4); call with T. Seri re strategy for review and analysis of newly produced documents for fact development (.5).	2.6	\$685.00	\$1,781.00
5/17/2023	Tesla Seri	Meet with K. Chen re documents for core case issues for team strategy and analysis meeting (.5), Correspond with K. Chen regarding Preferred Equity holders' documents for same (.4), Revise work product regarding same (.4), Review and analyze documents produced by Debtors regarding same (5.2).	6.5	\$570.00	\$3,705.00
5/17/2023	Tesla Seri	Meet with A. Pugh re document review.	0.5	\$570.00	\$285.00
5/17/2023	Tesla Seri	Review and analyze documents produced by Debtors regarding Preferred Equity holders' investment process.	4.8	\$570.00	\$2,736.00
5/17/2023	Tesla Seri	Correspondence with K. Chen regarding Preferred Equity holders' investment process and due diligence.	0.4	\$570.00	\$228.00
5/18/2023	Temidayo Aganga-Willis	Review documents circulated from S. Hershey.	0.4	\$1,435.00	\$574.00
5/18/2023	Temidayo Aganga-Willis	Research re 2004 motions.	0.3	\$1,435.00	\$430.50
5/18/2023	Temidayo Aganga-Willis	Communicate with counsel to Series B holders regarding ongoing discovery.	0.2	\$1,435.00	\$287.00
5/18/2023	Alvaro Rodrigo Mon-Cu	Review and analyze documents regarding core case issues for team strategy and analysis meeting.	3.3	\$1,190.00	\$3,927.00
5/18/2023	Claire O'Brien	Call with A. Mon Cureno re discovery strategy (.4), Review and revise draft letter memorializing May 17 meet and confer (1.0).	1.4	\$1,250.00	\$1,750.00
5/18/2023	Kayla Chen	Review and analyze documents re core case issues for team strategy and analysis meeting (3.7); draft work product of key documents re same (2.7).	6.4	\$685.00	\$4,384.00
5/18/2023	Zachary Mitchell	Draft meet-and-confer memorialization letter.	3.5	\$685.00	\$2,397.50
5/18/2023	Abbie Pugh	Draft analysis of documents for fact development work product.	0.3	\$685.00	\$205.50
5/18/2023	Tesla Seri	Review documents pertaining to substantive consolidation (8.0), Correspond with K. Chen re substantive consolidation matters (.3).	8.3	\$570.00	\$4,731.00
5/18/2023	Tesla Seri	Edit fact development work product.	4.0	\$570.00	\$2,280.00
5/19/2023	Jennifer M Selendy	Review and comment on letter memorializing discovery negotiations.	0.8	\$2,060.00	\$1,648.00

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Date	Person	Description of Services	Hours	Rate	Amount
<u>60 - Discovery and fact development</u>					
5/19/2023	Temidayo Aganga-Willis	Review and revise letter memorializing meet and confer.	0.3	\$1,435.00	\$430.50
5/19/2023	Claire O'Brien	Meet with Z. Mitchell re letter memorializing meet-and-confer (.4), Draft emails to counsel for Series B Preferred Holders re meet-and-confer (.4), Review and edit letter memorializing meet-and-confer with counsel for Series B Preferred Holders (2.9).	3.7	\$1,250.00	\$4,625.00
5/19/2023	Claire O'Brien	Call with T. Seri, K. Chen, and A. Pugh re documents for core case strategy meeting.	0.7	\$1,250.00	\$875.00
5/19/2023	Kayla Chen	Review and analyze documents re core case issues for team strategy and analysis meeting.	1.8	\$685.00	\$1,233.00
5/19/2023	Zachary Mitchell	Meet with C. O'Brien re revision to meet and confer memorialization letter (.3); revise meet-and-confer letter (.5).	0.8	\$685.00	\$548.00
5/19/2023	Tesla Seri	Correspond with K. Chen and A. Pugh regarding key documents for substantive consolidation matters. (1.0), Meet with C. O'Brien, K. Chen and A. Pugh regarding substantive consolidation issues. (.8).	1.8	\$570.00	\$1,026.00
5/19/2023	Tesla Seri	Review documents to identify key communications.	10.2	\$570.00	\$5,814.00
5/20/2023	Alvaro Rodrigo Mon-Cu	Review and analyze documents regarding core case issues for team strategy and analysis meeting.	5.7	\$1,190.00	\$6,783.00
5/20/2023	Claire O'Brien	Review and analyze documents for key case issues strategy meeting.	4.4	\$1,250.00	\$5,500.00
5/20/2023	Kayla Chen	Review and analyze documents for core case issues for team strategy and analysis meeting.	5.1	\$685.00	\$3,493.50
5/20/2023	Abbie Pugh	Review and analyze documents regarding core case issues for team strategy and analysis meeting (1.1); correspond with C. O'Brien re same (.1); draft email to team re same (.2).	1.4	\$685.00	\$959.00
5/20/2023	Tesla Seri	Review documents to identify key communications.	12.0	\$570.00	\$6,840.00
5/21/2023	Alvaro Rodrigo Mon-Cu	Review and analyze documents regarding core case issues for team strategy and analysis meeting.	3.1	\$1,190.00	\$3,689.00
5/21/2023	Claire O'Brien	Review and analyze documents for core factual and strategy issues meeting.	3.2	\$1,250.00	\$4,000.00

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Date	Person	Description of Services	Hours	Rate	Amount
<u>60 - Discovery and fact development</u>					
5/21/2023	Kayla Chen	Draft potential responses to Series B discovery (2.8), research legal standards and requirements for same (.8), correspond with C. O'Brien re same (.3).	3.9	\$685.00	\$2,671.50
5/21/2023	Zachary Mitchell	Review documents related to Series B Preferred Equity Holders' investment for core factual and strategy issues meeting.	0.5	\$685.00	\$342.50
5/21/2023	Tesla Seri	Review documents to identify key communications (7.2), Draft key documents summary (1.9),Correspond with internal team re key documents summary (.1).	9.2	\$570.00	\$5,244.00
5/22/2023	Faith E. Gay	Review possible discovery to be taken in near future.	1.3	\$2,060.00	\$2,678.00
5/22/2023	Alvaro Rodrigo Mon-Cu	Review and analyze documents to prepare related work product regarding core case issues for team strategy and analysis meeting.	3.2	\$1,190.00	\$3,808.00
5/22/2023	Alvaro Rodrigo Mon-Cu	Review discovery correspondence from Series B Preferred Shareholders.	0.2	\$1,190.00	\$238.00
5/22/2023	Claire O'Brien	Confer with K. Chen re 2004 discovery.	0.4	\$1,250.00	\$500.00
5/22/2023	Claire O'Brien	Draft email to counsel for Series B Preferred Holders re meet-and-confer (.4), Review letter from Series B Preferred Holders re meet-and-confer (.2).	0.6	\$1,250.00	\$750.00
5/22/2023	Claire O'Brien	Review and analyze documents for core case issues strategy meeting.	3.6	\$1,250.00	\$4,500.00
5/22/2023	Kayla Chen	Call with T. Seri re issues related to Series B (.2), review and analyze key documents (2.8).	3.0	\$685.00	\$2,055.00
5/22/2023	Kayla Chen	Draft potential responses to Series B discovery.	3.1	\$685.00	\$2,123.50
5/22/2023	Kayla Chen	Review response to meet and confer letter.	0.2	\$685.00	\$137.00
5/22/2023	Rachel Slepoy	Review and analyze notable documents elevated by T. Seri.	0.2	\$775.00	\$155.00
5/22/2023	Abbie Pugh	Review and analyze documents regarding core case issues for team strategy and analysis meeting (.5); draft analysis re same (.2).	0.7	\$685.00	\$479.50
5/22/2023	Abbie Pugh	Email correspondence with T. Chen re Relativity database (.3); set up coding layout for document review (.5); call with T. Seri re workflow for preferred equity document review (.3).	1.1	\$685.00	\$753.50
5/22/2023	Tesla Seri	Edit fact development work product (3.2), Correspond with internal team re notable documents (.3).	3.5	\$570.00	\$1,995.00

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Date	Person	Description of Services	Hours	Rate	Amount
<u>60 - Discovery and fact development</u>					
5/22/2023	Tesla Seri	Review and analyze documents for core case issues strategy meeting.	5.9	\$570.00	\$3,363.00
5/23/2023	Jennifer M Selendy	Review and edit draft response letter to Preferred Equity holders re meet and confer; review and comment on engagement letter with UCC.	0.5	\$2,060.00	\$1,030.00
5/23/2023	Temidayo Aganga-Willis	Correspondence with Series B holders regarding discovery.	0.2	\$1,435.00	\$287.00
5/23/2023	Alvaro Rodrigo Mon-Cu	Draft internal email re discovery strategy and response for Series B Preferred Shareholders.	0.4	\$1,190.00	\$476.00
5/23/2023	Alvaro Rodrigo Mon-Cu	Review and analyze documents for core case.	4.1	\$1,190.00	\$4,879.00
5/23/2023	Claire O'Brien	Meet with J. Selendy re response to counsel for Series B Preferred Holders (1.0), Draft response to counsel for Series B preferred holders re discovery (2.1), Review and analyze letter from counsel for Series B Preferred Holders (.6).	3.7	\$1,250.00	\$4,625.00
5/23/2023	Kayla Chen	Call with A. Pugh re search terms (1.3), meet with C. O'Brien re same (.3), correspond with C. O'Brien re same (.2).	1.8	\$685.00	\$1,233.00
5/23/2023	Kayla Chen	Review and analyze documents for core strategy and fact development issue meeting.	5.5	\$685.00	\$3,767.50
5/23/2023	Rachel Slepoi	Review and analyze key documents for core case issues meeting.	3.2	\$775.00	\$2,480.00
5/23/2023	Zachary Mitchell	Draft discovery review work product.	0.6	\$685.00	\$411.00
5/23/2023	Zachary Mitchell	Review documents to prepare for upcoming core factual issues meeting.	3.5	\$685.00	\$2,397.50
5/23/2023	Abbie Pugh	Call with K. Chen re search terms for document requests (.4); draft analysis of documents and add to fact development work product (.2).	0.6	\$685.00	\$411.00
5/23/2023	Abbie Pugh	Review and analyze documents regarding core case issues for team strategy and analysis meeting.	5.1	\$685.00	\$3,493.50
5/24/2023	Claire O'Brien	Emails with review attorney team regarding substance and timeline of substantive consolidation litigation document review.	1.0	\$1,250.00	\$1,250.00
5/24/2023	Claire O'Brien	Revise email response to Series B Preferred Holders re discovery.	0.2	\$1,250.00	\$250.00
5/24/2023	Zachary Mitchell	Update fact development work product with documents (.5); draft discovery review work product (.9).	1.4	\$685.00	\$959.00

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Date	Person	Description of Services	Hours	Rate	Amount
<u>60 - Discovery and fact development</u>					
5/24/2023	Abbie Pugh	Review and analyze documents for fact development (2.7); draft analysis of same and add to fact development work product (.5); draft email to C. O'Brien re analysis of document for fact development (.1).	3.3	\$685.00	\$2,260.50
5/24/2023	Tesla Seri	Review and analyze documents.	7.6	\$570.00	\$4,332.00
5/25/2023	Jennifer M Selendy	Review and comment on team's analysis and documents re discovery issues relating to regulatory requirements.	0.6	\$2,060.00	\$1,236.00
5/25/2023	Jennifer M Selendy	Confer with S. Hershey and C. O'Brien re response to Preferred Equity holders.	0.6	\$2,060.00	\$1,236.00
5/25/2023	Claire O'Brien	Call with S. Hershey re response to Series B Preferred Holders.	0.4	\$1,250.00	\$500.00
5/25/2023	Claire O'Brien	Call with Z. Mitchell, T. Agard, L. Sawczuk, and R. Abel re substantive consolidation document review.	0.5	\$1,250.00	\$625.00
5/25/2023	Zachary Mitchell	Call with A. Pugh and T. Seri re discovery review work product (.9); meet with R. Abel, T. Agard, L. Sawczuk and C. O'Brien re document review process (.5); prepare summary of discovery review (.4); draft discovery review work product (5.3).	7.1	\$685.00	\$4,863.50
5/25/2023	Abbie Pugh	Review and analyze documents for fact development (.2); draft notes re strategy for document review and analysis (.2); call with T. Seri and Z. Mitchell re same (.9).	1.3	\$685.00	\$890.50
5/25/2023	Tesla Seri	Meet with Z. Mitchel and A. Pugh re document review work product.	0.9	\$570.00	\$513.00
5/25/2023	Tesla Seri	Review and analyze documents produced in discovery.	9.1	\$570.00	\$5,187.00
5/25/2023	Lara Sawczuk	Meet with C. O'Brien to discuss substantive consolidation and related discovery.	0.4	\$400.00	\$160.00
5/25/2023	Lara Sawczuk	Review and analyze case filings for substantive consolidation document review.	2.8	\$400.00	\$1,120.00
5/25/2023	Robert Abel	Meet with T Agard, L. Sawczuk, Z. Mitchell, and C. O'Brien regarding offensive document review.	0.4	\$400.00	\$160.00
5/25/2023	Robert Abel	Review offensive document review work product for document review re preferred equity.	3.3	\$400.00	\$1,320.00
5/25/2023	Toni Agard	Call with C. O'Brien, Z. Mitchell and others re offensive discovery.	0.4	\$400.00	\$160.00

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Date	Person	Description of Services	Hours	Rate	Amount
<u>60 - Discovery and fact development</u>					
5/25/2023	Toni Agard	Review and analyze case filings for substantive consolidation and preferred equity document review.	7.3	\$400.00	\$2,920.00
5/26/2023	Temidayo Aganga-Willis	Review and analyze communications from Series B counsel re discovery.	0.2	\$1,435.00	\$287.00
5/26/2023	Claire O'Brien	Email with S. Hershey re production (.3), Email with counsel for equity holders re production (.2).	0.5	\$1,250.00	\$625.00
5/26/2023	Zachary Mitchell	Draft document review work product for staff attorney team.	3.5	\$685.00	\$2,397.50
5/26/2023	Abbie Pugh	Review and analyze documents produced by Series B preferred equity holders (.4); draft analysis of same and add to fact development work product (.1).	0.5	\$685.00	\$342.50
5/26/2023	Tesla Seri	Meet with A. Pugh and K. Chen re Series B Preferred Holders (.2), Meet with K. Chen re Series B Preferred Holders (.1), Review documents produced in discovery (6.9).	7.2	\$570.00	\$4,104.00
5/26/2023	Lara Sawczuk	Review and analyze case filings to prepare for substantive consolidation document review.	2.0	\$400.00	\$800.00
5/26/2023	Robert Abel	Review and analyze case filings to prepare for substantive consolidation document review.	5.7	\$400.00	\$2,280.00
5/26/2023	Toni Agard	Review and analyze case filings to prepare for substantive consolidation document review.	8.0	\$400.00	\$3,200.00
5/27/2023	Tesla Seri	Review documents to identify key communications (5.3), Correspond with C. O'Brien re discovery search terms (.2).	5.5	\$570.00	\$3,135.00
5/28/2023	Temidayo Aganga-Willis	Respond to Series B share holders re discovery.	0.2	\$1,435.00	\$287.00
5/28/2023	Temidayo Aganga-Willis	Communicate with C. Obrien regarding discovery issues.	0.2	\$1,435.00	\$287.00
5/28/2023	Claire O'Brien	Draft email response to counsel for WestCap re collection.	1.3	\$1,250.00	\$1,625.00
5/28/2023	Tesla Seri	Review documents to identify key communications (10.4), Correspond with C. O'Brien re discovery requests (.2).	10.6	\$570.00	\$6,042.00
5/29/2023	Jennifer M Selendy	Review notable documents for sub con motions.	2.5	\$2,060.00	\$5,150.00
5/29/2023	Tesla Seri	Review documents to identify key communications.	3.9	\$570.00	\$2,223.00
5/29/2023	Lara Sawczuk	Review and analyze case filings for substantive consolidation document review.	0.7	\$400.00	\$280.00

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Date	Person	Description of Services	Hours	Rate	Amount
<u>60 - Discovery and fact development</u>					
5/29/2023	Toni Agard	Review and analyze case filings for substantive consolidation document review.	3.5	\$400.00	\$1,400.00
5/30/2023	Temidayo Aganga-Willis	Communicate with Series B Preferred holders re discovery.	0.2	\$1,435.00	\$287.00
5/30/2023	Alvaro Rodrigo Mon-Cu	Review and revise draft document review work product.	2.9	\$1,190.00	\$3,451.00
5/30/2023	Alvaro Rodrigo Mon-Cu	Draft internal email re possible offensive discovery issues.	0.3	\$1,190.00	\$357.00
5/30/2023	Claire O'Brien	Email with M. Jaode and E. Cohen re production (.4), Email with A. Pugh re CDPQ custodians and document collection sources (.2), Email with J. Selendy and A. Mon Cureno re Westcap production scope and custodians (.7), Email with J. Selendy and counsel for equity holders re document collection scope and sources (.7).	2.0	\$1,250.00	\$2,500.00
5/30/2023	Kayla Chen	Review and analyze documents to produce to the Pref (2.6), correspond with C. O'Brien re same (.3).	2.9	\$685.00	\$1,986.50
5/30/2023	Rachel Slepoy	Review correspondence re discovery disputes with counsel for Preferred Equity Holders.	0.1	\$775.00	\$77.50
5/30/2023	Zachary Mitchell	Draft work product re Series B (.7); revise discovery review work product to incorporate edits from A. Mon Cureno (6.0); discuss fact modules assignment with R. Slepoy (.2).	6.9	\$685.00	\$4,726.50
5/30/2023	Abbie Pugh	Set up batches of documents produced by preferred equity holders for review.	1.2	\$685.00	\$822.00
5/30/2023	Abbie Pugh	Review and analyze documents produced by Preferred Series B equity holders (2.8); review and analyze documents re potential document custodians (.8); draft analysis of same (.1); Meet with C. O'Brien, R. Slepoy and others re discovery strategy (1.2).	4.9	\$685.00	\$3,356.50
5/30/2023	Tesla Seri	Review documents to identify key communications (8.6), Meet with C. O'Brien, R. Slepoy and others re case progress (1.2) Prepare catalogue of key documents relating to the preferred shareholders (.4).	10.2	\$570.00	\$5,814.00
5/30/2023	Robert Abel	Review and analyze case filings for substantive consolidation document review.	8.0	\$400.00	\$3,200.00
5/30/2023	Toni Agard	Review and analyze case filings for substantive consolidation document review.	8.0	\$400.00	\$3,200.00

FEES

Date	Person	Description of Services	Hours	Rate	Amount
60 - Discovery and fact development					
5/31/2023	Alvaro Rodrigo Mon-Cu	Review and revise draft document review work product (.9), draft internal summary re same (.3), correspond with White & Case re discovery responses and objections (.5), Internal correspondence with K. Chen re same (.3), Review and revise draft email to opposing counsel re third party discovery responses and objections (1.4).	3.4	\$1,190.00	\$4,046.00
5/31/2023	Claire O'Brien	Draft email response to counsel for Series B Preferred Holders re discovery, (2.1), Correspondence with J. Selendy, K. Chen, and S. Hershey re documents for production (.3); correspondence with M. Jaoude, S. Hershey, and A. Pugh re productions (.6); correspondence with Z. Mitchell, A. Pugh, and S. Hershey re fact timeline (.2); correspondence with L. Sawczuk, T. Agard, and R. Abel re document review analysis (.3).	3.5	\$1,250.00	\$4,375.00
5/31/2023	Zachary Mitchell	Prepare work product related to Series B (1.2); revise discovery review work product (2.0).	3.2	\$685.00	\$2,192.00
5/31/2023	Abbie Pugh	Set up document review tagging layout and batching (2.4); call with C. Bandes re same (.8); email correspondence with T. Chen re same (.2) research re same (.2); correspondence with K. Chen re database (.2).	3.8	\$685.00	\$2,603.00
5/31/2023	Tesla Seri	Review discovery review work product (.7), Review and code offensive documents (6.1), Review and tag communications (4.4), Draft document review summary report (.3).	11.5	\$570.00	\$6,555.00
5/31/2023	Lara Sawczuk	Review discovery review work product (1.2); review and code offensive documents (3.6).	4.8	\$400.00	\$1,920.00
5/31/2023	Robert Abel	Review document review work product (1.8); review and code offensive documents (6.2).	8.0	\$400.00	\$3,200.00
5/31/2023	Toni Agard	Review document review work product (2.1); and review and code offensive documents (5.9).	8.0	\$400.00	\$3,200.00
Subtotal for: 60 - Discovery and fact development			680.7		\$529,119.50

90 - Plan/Confirmation Matters

5/2/2023	Rachel Slepai	Review and summarize docket filings re substantive consolidation.	1.4	\$775.00	\$1,085.00
5/17/2023	Claire O'Brien	Email with potential expert re diligence expert services.	0.2	\$1,250.00	\$250.00

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Date	Person	Description of Services	Hours	Rate	Amount
90 - Plan/Confirmation Matters					
5/19/2023	Temidayo Aganga-Willi	Call with potential expert re expert services.	0.5	\$1,435.00	\$717.50
5/19/2023	Claire O'Brien	Call with potential expert re expert services (.5), Call with K. Chen re expert report (.2).	0.7	\$1,250.00	\$875.00
5/19/2023	Kayla Chen	Call with potential expert re expert services (.5), call with C. O'Brien re expert report (.2), compile documents for potential expert (1.6); correspond with A. Pugh and T. Goodrich re same (.2); call with C. O'Brien, A. Pugh and T. Goodrich re same (.6); correspond with S. Siegel re documents for potential expert (.2); email with potential expert re documents (.2).	3.5	\$685.00	\$2,397.50
5/19/2023	Abbie Pugh	Review and analyze documents for expert witness (2); call with K. Chen and T. Seri re same (.6).	2.6	\$685.00	\$1,781.00
5/19/2023	Scott Siegel	Prepare and organize materials for potential expert.	2.3	\$570.00	\$1,311.00
5/23/2023	Abbie Pugh	Review and analyze documents for potential expert (1.5); draft analysis of same (1); correspondence with K. Chen re same (.3).	2.8	\$685.00	\$1,918.00
5/25/2023	Claire O'Brien	Call with potential expert re expert services.	0.4	\$1,250.00	\$500.00
5/25/2023	Kayla Chen	Call with potential expert re expert services (.4), draft and send email re same to J. Selendy and T. Aganga-Williams (.2), correspond with T. Seri re same (.2) research and analyze substantive consolidation legal principles equitable considerations (1.6) , draft internal correspondence re potential expert (1.0).	3.4	\$685.00	\$2,329.00
5/26/2023	Jennifer M Selendy	Review and respond to e-mails from K. Chen and C. O'Brien re potential experts.	0.1	\$2,060.00	\$206.00
5/26/2023	Claire O'Brien	Email with K. Chen and J. Selendy re expert report (1.4), Call with J. Selendy re expert report (.2), Call with potential expert re expert report (.2), Email with potential expert re expert report (.3), Analyze experts for substantive consolidation litigation (.7), Call with K. Chen re expert report (.4), Call with Z. Mitchell re substantive consolidation research for expert report (.3).	3.5	\$1,250.00	\$4,375.00
5/26/2023	Claire O'Brien	Call with J. Schiffrin at M3 re Celsius.	0.2	\$1,250.00	\$250.00
5/26/2023	Kayla Chen	Correspond with C. O'Brien re expert report (.4); call with T. Seri and A. Pugh re expert (.2); correspond with T. Seri re same (.3); correspond with S. Siegel re same (.2); review and analyze documents re expert (5.2).	6.3	\$685.00	\$4,315.50

FEES

Date	Person	Description of Services	Hours	Rate	Amount
90 - Plan/Confirmation Matters					
5/26/2023	Zachary Mitchell	Call with C. O'Brien re scope of expert witness retention.	0.2	\$685.00	\$137.00
5/26/2023	Abbie Pugh	Call with K. Chen re analysis of due diligence materials for expert witness (.1); call with K. Chen and T. Seri re same (.2); review and analyze due diligence materials for expert witness (2).	2.3	\$685.00	\$1,575.50
5/26/2023	Tesla Seri	Review and prepare documents re expert analysis.	4.8	\$570.00	\$2,736.00
5/27/2023	Jennifer M Selendy	Confer with C. O'Brien and others re identifying an expert.	0.5	\$2,060.00	\$1,030.00
5/28/2023	Claire O'Brien	Call with S. Hershey re substantive consolidation litigation (.2), Email with potential expert re expert services(.2).	0.4	\$1,250.00	\$500.00
5/28/2023	Scott Siegel	Update materials for potential expert review.	0.5	\$570.00	\$285.00
5/30/2023	Jennifer M Selendy	Review potential expert resumes.	0.2	\$2,060.00	\$412.00
5/30/2023	Temidayo Aganga-Willis	Communicate with J. Selendy and C. Obrien re expert retention.	0.2	\$1,435.00	\$287.00
5/30/2023	Claire O'Brien	First call with potential expert re expert services (.5), Second call with potential expert re expert services (.8).	1.3	\$1,250.00	\$1,625.00
5/30/2023	Kayla Chen	Call with C. O'Brien and potential expert (.6); correspond with potential expert re expert services (.2); correspond with C. O'Brien re same (.1).	0.9	\$685.00	\$616.50
5/30/2023	Abbie Pugh	Review and analyze documents re expert.	0.6	\$685.00	\$411.00
5/31/2023	Claire O'Brien	Call with V. Jindal and K. Chen re expert report.	1.4	\$1,250.00	\$1,750.00
5/31/2023	Kayla Chen	Correspond with S.Siegel re expert documents (.3); call with V. Jindal and C. O'Brien re expert report (1.1); correspond with V. Jindal re documents (.6), correspond with V. Jindal re expert services.	2.2	\$685.00	\$1,507.00
5/31/2023	Scott Siegel	Create and update index re documents for potential expert (.5); prepare materials re documents for potential expert review (1.3).	1.8	\$570.00	\$1,026.00
Subtotal for: 90 - Plan/Confirmation Matters			45.2		\$36,208.50

95 - FTX Matters Filings

5/3/2023	Claire O'Brien	Email with J. Selendy, S. Siegal, and K. Chen re 2004 discovery motions.	0.2	\$1,250.00	\$250.00
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FEES

Date	Person	Description of Services	Hours	Rate	Amount
95 - FTX Matters Filings					
5/8/2023	Jennifer M Selendy	Review and respond to team correspondence re FTX issues.	0.6	\$2,060.00	\$1,236.00
5/8/2023	Kayla Chen	Review and analyze relevant deadlines and filings on CEL Token Valuation (.3); correspond with C. O'Brien re same (.2).	0.5	\$685.00	\$342.50
5/9/2023	Claire O'Brien	Call with S. Hershey re 2004 motion.	0.4	\$1,250.00	\$500.00
5/10/2023	Jennifer M Selendy	Conduct call with T. Aganga-Williams and C. O'Brien to discuss 2004 motion.	0.3	\$2,060.00	\$618.00
5/10/2023	Claire O'Brien	Draft emails to court regarding 2004 FTX motion.	0.3	\$1,250.00	\$375.00
5/10/2023	Claire O'Brien	Call with J. Selendy, T. Aganga-Williams, A. Mon Cureno re FTX 2004 motion.	0.3	\$1,250.00	\$375.00
5/11/2023	Alvaro Rodrigo Mon-Cu	Research service for Rule 2004 third party subpoenas (2.9), draft internal correspondence to K. Chen and C. O'Brien re same (.4); review and revise draft Rule 2004 subpoenas and notices (1.0).	4.3	\$1,190.00	\$5,117.00
5/11/2023	Claire O'Brien	Confer with K. Chen and A. Mon Cureno re FTX service (.3); email with S. Siegal, S. Hershey, and J. Selendy re case procedure requirements following order granting 2004 motion (.2).	0.5	\$1,250.00	\$625.00
5/11/2023	Kayla Chen	Research and analyze federal rules of civil procedure, federal bankruptcy rules for FTX subpoena notice and service procedures (2.6); correspond with A. Pugh and S. Siegel re same (.2); correspond with A. Mon Cureno re same (.4); correspond with S. Metro re same (.1); draft notice of subpoenas to FTX Debtors (.6); draft revised RFPs to include in subpoena packets for FTX Debtors (.7); revise notice of subpoenas to FTX Debtors incorporating A. Mon Cureno edits and comments (.6); revise RFPs to include in subpoena packets to FTX Debtors incorporating same (.4); correspond with S. Siegel re subpoena packets to FTX Debtors (.2).	5.8	\$685.00	\$3,973.00
5/11/2023	Abbie Pugh	Draft subpoenas to FTX entities (.6); correspond with K. Chen, A. Mon Cureno, and S. Siegel re same (.1).	0.7	\$685.00	\$479.50
5/11/2023	Anna Clifton	Research US registered agent names and addresses of FTX debtors.	2.6	\$630.00	\$1,638.00
5/11/2023	Scott Siegel	Coordinate with A. Mon Cureno and K. Chen regarding FTX Debtor Subpoena project (.8); Prepare subpoena notices for FTX Debtors (.5); Prepare FTX address excel for mail service (.3).	1.6	\$570.00	\$912.00

FEES

Date	Person	Description of Services	Hours	Rate	Amount
<u>95 - FTX Matters Filings</u>					
5/12/2023	Temidayo Aganga-Willi	Review subpoena packet to the FTX Debtors.	0.2	\$1,435.00	\$287.00
5/12/2023	Alvaro Rodrigo Mon-Cu	Correspond with K. Chen and C. O'Brien re filing of Rule 2004 subpoenas (2.3); research service for Rule 2004 third party subpoenas (2.2); and correspond with K. Chen and C. O'Brien re same (.6).	5.1	\$1,190.00	\$6,069.00
5/12/2023	Claire O'Brien	Call with A. Mon Cureno re service on FTX debtors (.3); call with K. Chen re service on FTX Debtors (.3).	0.6	\$1,250.00	\$750.00
5/12/2023	Kayla Chen	Correspond with S. Siegel re FTX subpoena packets (.4); draft and revise notice of subpoenas to FTX Debtor (.3); research and analyze case management orders, federal bankruptcy rules, federal rules of civil procedure and local rules re notice and service for same (.7); correspond with J. Selendy and T. Aganga-Williams re notice of subpoenas and FTX subpoenas (.2); correspond with C. O'Brien re notice and service of FTX subpoenas (.3); Call with A. Mon Cureno and S. Metro re same (.2); Call with A. Mon Cureno re same (.1).	2.2	\$685.00	\$1,507.00
5/12/2023	Anna Clifton	Research US registered agent names and addresses of FTX debtors.	5.3	\$630.00	\$3,339.00
5/12/2023	Tyler Burke	Research addresses for the FTX Debtor entities findings for mail service (0.8); communicate with A. Clifton re same (0.4).	1.2	\$685.00	\$822.00
5/12/2023	Scott Siegel	Prepare subpoena packet for each FTX Debtors (100x) (2.3); review and edit FTX debtor address excel for mail service (1.2).	3.5	\$570.00	\$1,995.00
5/14/2023	Alvaro Rodrigo Mon-Cu	Correspondence with K. Chen re third party discovery subpoenas.	0.6	\$1,190.00	\$714.00
5/14/2023	Kayla Chen	Correspond with S. Siegel re subpoena packets for FTX Debtors (.5); correspond with A. Mon Cureno re FTX subpoena service (.2); research relevant statutory provisions re subpoena service (.4); review, research analyze and update FTX debtor addresses for subpoena service (1.2); draft and revise notice of subpoenas to FTX Debtors (.2).	2.5	\$685.00	\$1,712.50
5/15/2023	Alvaro Rodrigo Mon-Cu	Correspond with K. Chen and S. Siegel re service of third-party subpoenas.	1.3	\$1,190.00	\$1,547.00
5/15/2023	Claire O'Brien	Prepare and e-mail serve FTX Debtors with subpoenas per 2004 order (2.4; meet with K. Chen re service for 2004 order subpoenas to FTX Debtors (.4).	2.8	\$1,250.00	\$3,500.00

FEES

Date	Person	Description of Services	Hours	Rate	Amount
<u>95 - FTX Matters Filings</u>					
5/15/2023	Kayla Chen	Correspond with S. Siegel re subpoena packets for service (.5); meet with C. O'Brien re service of FTX debtors (.3); draft and revise notice of subpoenas (.8); correspond with S. Metro notice of subpoenas filing and service (.4); proof notice of subpoenas and subpoena packets (.9); file notice of subpoenas (.8); correspond with J. Selendy and T. Aganga-Williams re notice and service of FTX subpoenas (.4); file notice of subpoenas (.9); correspond with Kroll re service of notice of subpoenas (.2).	5.4	\$685.00	\$3,699.00
5/15/2023	Christopher Journey	Review of addresses chart for FTX subpoenas for mail service (.6); correct data in addresses chart for FTX subpoenas for mail service (1.7); internet searches regarding addresses for FTX entities for mail service (.3); confer with S. Siegel regarding address format and mail merge (.4); revise address chart formatting for FTX subpoenas (3.6); create and rename final subpoena packets for FTX Debtors (.9); confer with S. Siegel re final formatting for subpoenas for FTX Debtors (.6).	8.1	\$570.00	\$4,617.00
5/15/2023	Scott Siegel	Update FTX Debtor address chart re International debtors for mail service (1.0); create and QC 70 subpoenas for FTX Debtors (3.0); create and QC 100 subpoena packets for FTX Debtors (3.2); finalize subpoena packets and notice for e-filing (1.2).	8.4	\$570.00	\$4,788.00
5/15/2023	Steven M Metro	Draft and revise Notice of Subpoenas and Subpoenas on FTX debtors.	3.7	\$570.00	\$2,109.00
5/16/2023	Claire O'Brien	Confer with K. Chen and A. Mon Cureno re mail service on FTX Debtors.	0.2	\$1,250.00	\$250.00
5/16/2023	Kayla Chen	Correspond with S. Siegel, C. O'Brien and A. Mon Cureno re subpoena packets for mail service on FTX Debtors.	0.5	\$685.00	\$342.50
5/28/2023	Jennifer M Selendy	Review and edit draft correspondence to Sullivan & Cromwell re UCC discovery on FTX.	0.3	\$2,060.00	\$618.00
5/30/2023	Temidayo Aganga-Williams	Communicate with J. Selendy and C. O'Brien re FTX discovery.	0.2	\$1,435.00	\$287.00
5/30/2023	Temidayo Aganga-Williams	Communicate with FTX debtors re discovery requests.	0.2	\$1,435.00	\$287.00
5/30/2023	Claire O'Brien	Email with T. Aganga-Williams, J. Selendy, A. Mon Cureno, and K. Chen re FTX claim.	1.0	\$1,250.00	\$1,250.00
5/30/2023	Claire O'Brien	Review letter response from FTX re 2004 subpoenas.	0.2	\$1,250.00	\$250.00

FEES

Date	Person	Description of Services	Hours	Rate	Amount
<u>95 - FTX Matters Filings</u>					
5/31/2023	Jennifer M Selendy	Review FTX discovery response and discuss same with C. O'Brien.	0.2	\$2,060.00	\$412.00
5/31/2023	Temidayo Aganga-Willis	Draft response to FTX debtors re discovery (.6); research regarding discovery requests to FTX (1.0).	1.6	\$1,435.00	\$2,296.00
5/31/2023	Claire O'Brien	Email with T. Aganga-Williams, A. Mon Cureno, F. Gay and D. Latona re FTX claim (1.1); correspond with J. Selendy, T. Aganga-Williams, and A. Mon Cureno re FTX claim (.4).	1.5	\$1,250.00	\$1,875.00
5/31/2023	Kayla Chen	Draft response to FTX response to subpoenas (2.3); correspond with T. Aganga-Williams, J Selendy and A. Mon Cureno re same (.5); draft talking points for meet and confer with FTX (2.9).	5.7	\$685.00	\$3,904.50
Subtotal for: 95 - FTX Matters Filings			80.6		\$65,668.50
Total Professional Services			1,006.7		\$814,711.00

Exhibit D

Expense Summary & Detail

<u>Category</u>	<u>Amount</u>
Courier Service	\$100.06
E-Discovery Data Hosting / Storage	\$ 341.38
Online Research	\$480.00
Outside Printing	\$756.70
Travel (Taxi – Business)	\$374.66
Overtime Meals	\$150.00
Grand Total	\$2,202.80

<u>Timekeeper</u>	<u>Date</u>	<u>Narrative</u>	<u>Category</u>	<u>Amount</u>
Temidayo Aganga-Williams	5/2/2023	Seamless North America LLC- Meals- T.Aganga-Williams-Dinner	Overtime Meals	\$40.00
Temidayo Aganga-Williams	5/3/2023	Uber Technologies, Inc.- Travel- T.Aganga-Williams-Home	Travel	\$75.24
Zachary. Mitchell	5/5/2023	Seamless North America LLC- Meals- Z.Mitchell-OT Dinner for time spent on Meet and Confer talking points	Overtime Meals	\$40.00
Jennifer Selendy	5/15/2023	American Express- Courier Service- Fed Invoice #8-116-18117 & #8-116-18118	Courier Service	\$100.06
Scott Siegel	5/15/2023	On Press Graphics- Copy Service- 522 color copies; 2411 b/w copies; 262 regular tabs; 3 binders	Outside Printing	\$756.70
Christopher Journey	5/16/2023	Uber Technologies, Inc.- C.Journey-Assist in preparation of subpoena packets-Overtime Meal	Overtime Meals	\$30.00
Christopher Journey	5/16/2023	Uber Technologies, Inc.- Travel- C.Journey-Support firm members with subpoenas and filing.	Travel	\$130.89
Christopher Journey	5/16/2023	Uber Technologies, Inc.- Travel- C.Journey-Support firm members with subpoenas and filing-tip.	Travel	\$19.63
Kayla Chen	5/16/2023	Uber Technologies, Inc.- Travel- K.Chen-Working late - FTX filing	Travel	\$56.97
Kayla Chen	5/16/2023	Uber Technologies, Inc.- Travel- K.Chen-Working late - FTX filing-tip	Travel	\$11.39
Scott Siegel	5/16/2023	Uber Technologies, Inc.- Travel- S.Siegel-subpoena ftx debtor project	Travel	\$36.90
Scott Siegel	5/16/2023	Uber Technologies, Inc.- Travel- S.Siegel-subpoena ftx debtor project-tip	Travel	\$3.69
Kayla Chen	5/23/2023	Seamless North America LLC- Meals- K.Chen-Working late - discovery and fact development	Overtime Meals	\$40.00
Alvaro Mon Cureno	5/30/2023	Alvaro Mon Cureno- Travel- Wi-Fi fee service - for work during flights. 001534-000001	Travel	\$39.95

<u>Timekeeper</u>	<u>Date</u>	<u>Narrative</u>	<u>Category</u>	<u>Amount</u>
Christopher Bandes	5/31/2023	Document Hosting/Technical Time	E-Discovery Data Hosting/Storage	\$341.38
Tyler Burke	5/31/2023	Pacer Charges	Online Research	\$40.80
Tyler Burke	5/31/2023	RELX Inc. dba LexisNexis- Online Research- service period May 2023	Online Research	\$26.19
Tyler Burke	5/31/2023	Westlaw Charges	Online Research	\$413.01
Grand Total				\$2,202.80